

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREG ABBOTT, ET AL.,

Defendants.

CIVIL ACTION NO. 1:23-CV-00853-DAE

**DEFENDANTS' CORRECTED RESPONSE AND OBJECTIONS TO
PLAINTIFF'S PRETRIAL FILINGS**

Pursuant to the Court's Order Resetting Bench Trial and Related Deadlines, ECF No. 214, Defendants Greg Abbott, in his official capacity as Governor of the State of Texas, and the State of Texas, submitted their Response and Objections to Plaintiff's Pre-Trial Filings (ECF No. 241) on October 30, 2024 (ECF 244). However, Defendants inadvertently attached the wrong draft for their Response and Objections to Plaintiff's Exhibit List. Defendants hereby file this corrected Response and Objections to Plaintiff's Pretrial Filings.

Plaintiff has represented to the Court and to Defendants that Plaintiff has decided that it will not present any testimony or other evidence at trial to support its longstanding contentions that the Rio Grande River is navigable on the basis of current navigability or "reasonable improvements" that would render the River susceptible to navigation. Nevertheless, Plaintiff has not waived its contentions that either current navigability or reasonable improvements establish the navigable status of the Rio Grande River. Plaintiff expressly stated its intent to "preserve for appeal its argument that the Fifth Circuit's approach to future navigability is legally correct." ECF No. 236 at 5.

In an attempt to streamline trial, Defendants offered to consider reducing its own witnesses on current navigability and reasonable improvements, if Plaintiff would jointly stipulate that Plaintiff has waived its contentions regarding current navigability and reasonable improvements.

Plaintiff declined this invitation to narrow the scope of their arguments.

Accordingly, Defendants expect to present trial witnesses and evidence to prove the non-navigability of the River by presenting evidence relevant to all three prongs of the test for navigability—current navigation, historic navigation, susceptibility to navigation following reasonable improvements. *United States v. Appalachian Elec. Power Co.*, 311 U.S. 377, 407-09 (1940). At the conclusion of trial, Defendants anticipates that it will request findings and conclusions by the Court that Plaintiff failed to carry its burden to prove that the Rio Grande River is a navigable water on any basis, including current navigability and reasonable improvements. Defendants also anticipate requesting that the Court issue a declaratory judgment that the Rio Grande River at the location relevant to this case is not currently navigable and cannot be made navigable by reasonable improvements. Finally, Defendants may seeki reconsideration of the Court’s order dismissing Defendants’ counterclaim based on the changes Plaintiff has recently made to its case.

I. OBJECTIONS TO PLAINTIFF’S WITNESS LIST

Plaintiff listed Michael D. Chapman as a witness in its Case in Chief. Defendants object to Mr. Chapman testifying in Plaintiff’s Case in Chief. Mr. Chapman was not designated as an expert witness as required by the Agreed Scheduling Order. *See* ECF No. 97. Plaintiff identified him as a rebuttal expert witness on the deadline the Court assigned for identification of rebuttal experts. Plaintiff now seeks to evade the requirements of the Court’s Scheduling Order and re-purpose Mr. Chapman as a witness in its case-in-chief. To resolve this issue, Defendants filed Defendants’ Opposed Motion to Preclude Rebuttal Expert Witness Chapman from Testifying Other Than in Rebuttal on October 24, 2024. ECF No. 235.

II. OBJECTIONS TO PLAINTIFF’S EXHIBITS

Defendants object to Plaintiff’s Exhibits as follows:

Exhibit Number	Description	Bates Label	Will Offer	May Offer	Objections	Argument
P-0001	Remote Oral and Videotaped Deposition of Adrian Cortez. Date: 05/22/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0002	Adrian Cortez Signed Errata. Date: 06/28/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0003	Adrian Cortez CV (Cortez Dep. Ex. 1).			*	Hearsay, unfair prejudice, bolstering, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence, violates FRCP 32, and not designated	In addition to the obviously objectionable nature of the exhibit, Timmel testified at his deposition that he did not rely on any of these documents when forming his opinions in the case
P-0004	Expert Report on Rio Grande Basin Operations (Cortez Dep. Ex. 2). Date: 05/09/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in

					presentation of cumulative evidence	document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0005	Letter from Brian Lynk, to Ryan Walters. Identification of United States anticipated expert witnesses at trial (Cortez Dep. Ex. 3). Date: 01/24/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and not subject to an exception, and the document contains no facts relevant to the issues before the Court
P-0006	Letter from Andrew Knudsen, to Ryan Walters. Identification of United States anticipated expert witnesses at trial (Cortez Dep. Ex. 4). Date: 05/03/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and not subject to an exception, and the document contains no facts relevant to the issues before the Court
P-0007	"Appendix 3. Table of River Mileages." (Cortez Dep. Ex. 5).			*	None	Mutual Exhibit
P-0008	Navigability Study. Rio Grande, Tributaries, and Lakes (Cortez Dep. Ex. 6). Date: March 1975.			*	None	Mutual Exhibit
P-0009	Deposition of: Benjamin Heber Johnson, Ph.D. Date: 05/29/2024.			*	Hearsay, bolstering, , and needless presentation of cumulative evidence	Document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and is cumulative of the testimony Johnson will present at trial

P-0012	Rio Grande, by Leon C. Metz (Johnson Dep. Ex. 7). Date: 1952.			*	None	
P-0013	Notes on the Upper Rio Grande, by Bryant P. Tilden, Jr. (Johnson Dep. Ex. 9). Date: 1847.			*	None	
P-0014	River of Lost Dreams. Navigation on the Rio Grande, by Pat Kelley (Johnson Dep. Ex. 10). Date: 1928.			*	None	
P-0015	Letter from Daniel W. Kingsbury, to Major W.W. Chapman, A. QR Master, Ft. Brown, Texas. (Johnson Dep. Ex. 11). Date: 05/18/1849.			*	None	
P-0016	Transcription of Letter from Daniel W. Kingsbury, to Major W.W. Chapman, A. QR Master, Ft. Brown, Texas, by Defendants. (Johnson Dep. Ex. 12) Date: 05/18/1849.			*	None	
P-0017	Historical maps of the Rio Grande. (Johnson Dep. Ex. 13).			*	None	
P-0019	Great River. The Rio Grande in North American History. By Paul Horgan. (Johnson Dep. Ex. 15).			*	None	
P-0020	Bulletin 48 West Texas Historical and Scientific Society: Publications. (Johnson Dep. Ex. 16) Date: 03/02/1920.			*	None	

P-0022	Map of Eagle Pass, Texas (1887). (Johnson Dep. Ex. 18) Date: 1887.			*	None	
P-0024	Oral and Videotaped Deposition of Tim MacAllister. Date: 05/31/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0025	First Amended Complaint. (MacAllister Dep. Ex. 5). Date: 09/28/2023.			*	Pleadings are not evidence, hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pleadings are not evidence
P-0026	33 CFR Part 329 Definition of Navigable Waters of the US. (MacAllister Dep. Ex. 8).			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0027	Report of the American Section of the International Water Commission United States and Mexico. (MacAllister Dep. Ex. 9). Date: 04/21/1930.			*	None	

P-0028	Army Corps of Engineers sets priorities for inland waterways projects. (MacAllister Dep. Ex. 10). Date: 05/22/2024.			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0029	International Boundary and Water Commission (IBWC) United States and Mexico U.S. Section. Rio Grande Canalization Project - Record of Decision. (MacAllister Dep. Ex. 12).			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0030	USACE Navigational Charts. (MacAllister Dep. Ex. 13).			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0031	Gateways to Commerce. (MacAllister Dep. Ex. 14). Date: 1992.			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0032	Chart Coverage in Coast Pilot 4 - Chapter 12. (MacAllister Dep. Ex. 15). Date: 05/26/2024.			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0033	Intracoastal Waterway shipping route, United States. (MacAllister Dep. Ex. 16).			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore,

					cumulative evidence	this information is irrelevant
P-0034	Tennessee - Tombigbee Waterway. (MacAllister Dep. Ex. 17).			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0035	Remote Oral and Videotaped Deposition of Captain John C. Timmel. Date: 06/05/2024.			*	Hearsay, unfair prejudice, bolstering, needless presentation of cumulative evidence, not designated	Document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court, unfairly prejudicial and bolstering to a testifying witness
P-0036	Expert Opinion Report of Captain John C. Timmel. (Timmel Dep. Ex. 1) Date: 05/09/2024.			*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0037	Supplemented Disclosure of Additional Information Considered & Erratum (Timmel Dep. Ex. 2). Date: 06/04/2024.			*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to

						the issues before the Court
P-0038	Captain John C. Timmel Expert Opinion Report. VIII. Expert's C.V. (Timmel Dep. Ex. 5) Date: 05/09/2024.			*	None	
P-0039	Email from Brian Lynk, to John Timmel, et al. USA v. Abbott: Tummel's Interview Questions 9CBP follow-up) (Timmel Dep. Ex. 6). Date: 02/14/2024.	US0000587-588		*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross- examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0040	Tummel's Interview Questions (Timmel Dep. Ex. 7). Date: 02/01/2024.	US0000585-586		*	Authentication, hearsay, hearsay within hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	lacks authentication, Timmel testified that the author is unknown, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross- examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0041	Email from Brian Lynk, to John Timmel, et al. Information from IBWC (Timmel Dep. Ex. 8). Date: 02/13/2024.	US0000596-598		*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross- examine testimony in document, and document contains no facts relevant to the issues before the Court

P-0042	Email from Juan Uribe, to Rebecca Rizzuto, et al. Information (Timmel Dep. Ex. 9). Date: 02/12/2024.	US0000794-797		*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0043	Email from Brian Lynk, to John Timmel, et al. Follow-up questions from Timmel for CBP (Timmel Dep. Ex. 10). Date: 02/29/2024.	US0000591-594		*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0044	Timmel Dep. Ex. 11.			*	None	
P-0045	Email from Melanie Casner, to John Timmel, Brian Lynk. DRAFT REPORT - USACOE Data (Timmel Dep. Ex. 12). Date: 04/19/2024.	US0000801-803		*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0046	Oral Deposition of Mario Gomez. Date: 08/07/2023.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to

						the issues before the Court
P-0047	Declaration of Mario Gomez in Support of the United States' Motion for Preliminary Injunction (Gomez Dep. Ex. 1). Date: 07/25/2023.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0048	CBP Releases June 2023 Monthly Update (Gomez Dep. Ex. 2). Date: 07/18/2023.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0049	Mario Gomez Errata and Certification. Date: 08/08/2023.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0050	Video conferenced Oral Deposition of Captain Justin Peters. Date: 08/07/2023.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in

					presentation of cumulative evidence	document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court
P-0051	Memo from Commander, to Commanding Officer. Navigability Determination (Peters Dep. Ex. 1). Date: 10/19/1984.			*	None	
P-0052	Google Map Image of Rio Grande River (Peters Dep. Ex. 2). Date: 08/07/2023.			*	None	
P-0053	Declaration of Captain Justin Peters (Peters Dep. Ex. 3). Date: 07/25/2023.			*	None	
P-0054	Oral Deposition of Joseph Shelnutt. Date: 08/07/2023.			*	Hearsay, bolstering, , and needless presentation of cumulative evidence	Document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and is cumulative of the testimony Johnson will present at trial
P-0055	Subpoena to Testify at a Deposition in a Civil Action to: Mr. Joseph Shelnutt. (Shelnutt Dep. Ex. 1). Date: 08/04/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0056	Declaration of Joseph L. Shelnutt. (Shelnutt Dep. Ex. 2). Date: 07/25/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of	Individual is a testifying W, document is hearsay, Defendants cannot cross-examine testimony in

					cumulative evidence	document, and document contains no facts relevant to the issues before the Court
P-0057	Map of Texas Districts (Shelnutt Dep. Ex. 3). Date: 08/23/2011.		*		None	
P-0058	Navigable Waters of the United States in the Fort Worth, Albuquerque, and Tulsa Districts Within the State of Texas (Shelnutt Dep. Ex. 4). Date: 12/20/2011.		*		None	
P-0059	Title 33 - Navigation and Navigable Waters, Chapter I - Coast Guard, Department of Homeland Security, Subchapter A - General, Part 2 - Jurisdiction, Subpart B - Jurisdictional Terms. Date: 08/03/2023.			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0060	Joseph Shelnutt Errata and Certification. Date: 08/09/2023.			*	Hearsay, bolstering, , and needless presentation of cumulative evidence	Document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and is cumulative of the testimony Johnson will present at trial
P-0061	Declaration of Victor Escalon In Opposition to Motion for Preliminary Injunction. Date: 08/09/2023.			*	None	

P-0062	Declaration of Loren Flossman In Opposition to Motion for Preliminary Injunction. Date: 08/09/2023.			*	None	
P-0066	Declaration of Major Chris Nordloh in Opposition to the Motion for Preliminary Injunction. Date: 08/08/2023.			*	None	
P-0067	Photograph of Floating Barrier (PI Hearing Ex. G54).			*	None	
P-0068	Photograph of Floating Barrier (PI Hearing Ex. G55).			*	None	
P-0069	Photograph of Floating Barrier (PI Hearing Ex. G56).			*	None	
P-0070	Determination Pursuant to Section 102 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, as Amended, 85 Fed. Reg. 14,953 (March 16, 2020). Date: 03/16/2020.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0071	Declaration of Abraham Garcia. Date: 07/24/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court, pictures do not reflect the current location of the buoys and there are no facts in dispute about the installation

						of the buoys
P-0072	Declaration of Jason D. Owens. Date: 07/26/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0073	Declaration of Capt. Brandy Parker Regarding Navigability Determination of the Rio Grande River. Date: 07/24/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0074	Declaration of Jennifer T. Pena In Support of the United States' Motion for Preliminary Injunction. Date: 07/25/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0075	Declaration of Hillary Quam. Date: 07/24/2023.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0076	Letter from Todd Kim, Jaime Esparaza, to Greg Abbott, Angela Colmenero. Notice of Prospective Filing of Legal Action Regarding Unlawful			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in

	Activities in Rio Grande River. Date: 07/20/2023.					document, and document contains no facts relevant to the issues before the Court
P-0077	Letter from Greg Abbott, to Joseph Biden. Response to notice of prospective filing of legal action regarding unlawful activities in Rio Grande river. Date: 07/24/2023.			*	None	
P-0094	Adrian D. Cortez CV. Date: 05/09/2024.	US0002348-351		*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence, and duplicative of P-003	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court, and is duplicative of P-003
P-0095	EaglePassDataSetExport-Discharge.Daily Rounded cfs@08458000.csv	US0001112-112		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0096	EaglePassDataSetExport-Discharge.Daily Rounded cfs@08458000-postAmistad.xls	US0001113-113		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0097	EaglePassDataSetExport-Discharge.Daily Rounded cfs@08458000-preAmistad.xlsx	US0001114-114		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant

P-0098	ElPasoDataSetExport-Discharge. Daily Rounded cfs@08364000.xlsx	US0001115-115		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0099	FIowM13Jimnez-Median.xlsx	US0001116-116		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0100	General Criteria for Flood Operations at Amistad Dam.	US0001117-135		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0101	Table of Contents. Project Technical Summaries.	US0001136-317		*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The USA no longer contends that the Rio Grande can be made navigable with reasonable improvements; therefore, this information is irrelevant
P-0102	Expert Report of Adrian Cortez. Date: 05/21/2024.			*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and document contains no facts relevant to the issues before the Court

P-0103	Cortez Report Fig. 1. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0104	Cortez Report Fig. 2. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0105	Cortez Report Fig. 3. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0106	Cortez Report Fig. 4. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0107	Cortez Report Table 1. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-

					cumulative evidence	examine statements in document, and document contains no facts relevant to the issues before the Court
P-0108	Cortez Report Fig. 5. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0109	Cortez Report Fig. 6. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0110	Cortez Report Fig. 7. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0111	Cortez Report Table 2. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court

P-0112	Cortez Report Table 3. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0113	Cortez Report Fig. 8. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0114	Cortez Report Fig. 9. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0115	Cortez Report Fig. 10. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0116	Cortez Report Fig. 11. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-

					cumulative evidence	examine statements in document, and document contains no facts relevant to the issues before the Court
P-0117	Cortez Report Fig. 12. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0118	Cortez Report Fig. 13. Date: 05/21/2024.			*	Hearsay, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is not testifying, document is hearsay and not subject to an exception, Defendants cannot cross-examine statements in document, and document contains no facts relevant to the issues before the Court
P-0119	Email from Esteban Martinez, to Jeremy Wall, et al. Information. Date: 02/12/2024.	IBWC0020377-379		*	Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0120	Email from Rebecca Rizzuti, to Jeremy Wall, et al. Information. Date: 02/12/2024.	IBWC0020385-387		*	Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document

						contains no facts relevant to the issues before the Court
P-0121	Email from Juan Urlbe, to Rebecca Rizzuti. Information. Date: 02/12/2024.	IBWC0020432-435		*	Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0122	Email from Sidney Rouch, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020437-439		*	Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0123	Email from Evelio Siller, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020462-462		*	Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0124	Email from Juan Urlbe, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020464-467	*		Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in

						document, and document contains no facts relevant to the issues before the Court
P-0125	Email from Sidney Rouch, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020469-473	*		Authentication, hearsay, unfair prejudice, undue delay, waste of time, needless presentation of cumulative evidence	Lacks authentication, author is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0126	Drawing from Frank Leslie's Illustrated Newspaper (Johnson Report, p. 28). Date: 09/03/1864.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Image depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0127	Photograph, Jesse Sumpter, Paso del Aguilar (Johnson Report, p. 29). Date: Approx. 1870s-1880s.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Image depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0128	Photograph, Jeff Taylor, Sr. (Johnson Report, p. 31). Date: Approx. 1910s- 1920s.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Image depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0130	Johnson Report, Appendix A: Bibliography of Sources Consulted. Date: 05/10/2024.			*	Hearsay, unfair prejudice, bolstering, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is a testifying W, document is hearsay and not subject to an exception, document is meant to bolster W testimony, and document contains no facts relevant to the issues before the Court, such as bank-to-bank ferry activity

P-0131	Johnson Report, Appendix B: Map of the Lower Rio Grande. Date: 05/10/2024.			*	None	
P-0132	Johnson Report, Appendix C: Lower Rio Grande Timeline. Date: 05/10/2024.		*		Hearsay, unfair prejudice, bolstering, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Author is a testifying W, document is hearsay and not subject to an exception, document is meant to bolster W testimony, document is a demonstrative or illustrative and should not be admitted into evidence, and document contains no facts relevant to the issues before the Court, such as bank-to-bank ferry activity
P-0133	Johnson Report, Appendix D: Johnson Resume. Date: 05/10/2024.			*	None	
P-0134	Johnson Report, Appendix E: Additional rule 26(a)(2) Disclosures. Date: 05/10/2024.			*	None	
P-0135	Letter from Kimere Kimball, to Ryan Walters. Supplemental Expert Disclosure of Dr. Benjamin H. Johnson. Date: 05/28/2024.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0136	Supplemental Expert Report of Benjamin H. Johnson, Ph.D. Date: 05/28/2024.			*	Hearsay, unfair prejudice, bolstering, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, document is intended to bolster W testimony, Defendants cannot cross-examine testimony in

						document, and document contains no facts relevant to the issues before the Court
P-0146	Photograph, Eagle Pass 1880s (produced in May 28, 2024 disclosure).		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0148	The Coast Depot and Shipping Port of the Valley of the Rio-Grande, and the Provinces of Mexico Tributary Thereto, with the Government Map of that Region of Country, Published in 1850, Together with The Report of the Explorations of the Rio Grande. Date: 1850.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0149	Watercolor of View of Fort Duncan, near Eagle Pass.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0150	Watercolor of Military Colony Opposite Fort Duncan, Texas.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0151	Neither Fish Nor Fowl: A Jewish Family on the Rio Grande. Date: 09/20/2023.		*		Authenticity, Hearsay, Relevance or, alternatively, undue delay, waste of time	This is an unpublished book prepared by someone in 2023 allegedly based on a draft memoir written by a now deceased person in 1993 that has since been "heavily edited." The original 1993 memoir is not being offered

						in violation of the best evidence rule. The document is also over 500 pages long. The document shows bank-to-bank ferry activity, not upstream/downstream commercial navigation and is therefore, irrelevant
P-0152	Handwritten note, Mr. Schuchardt to Mr. Hunter. Report on commerce and trade. Date: 10/30/1881.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The document reflects bank-to-bank activity, not upstream/downstream commercial navigation
P-0153	Life on the Rio Grande.		*		None	Mutual Exhibit
P-0154	Photograph, Taylor Collection.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0155	Photograph, Taylor Collection.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0156	Photograph, Taylor Collection.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0157	Photograph, Taylor Collection.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream

					cumulative evidence	
P-0158	Photograph, Jeff Taylor, Sr. Collection. Date: Approx. 1910s-1920s.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0159	Johnson Report Appendix B, Lower Rio Grande River		*		None	
P-0160	1923 Report of Chief of Engineers, U.S. Army.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0163	Letter from Joe Sheard, to HDQA, et al. Navigability Study of the Rio Grande. Date: 03/31/1975.		*		None	
P-0164	Annual Reports Index.		*		Undisclosed evidence, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The annual reports index is not a document disclosed. It is prejudicial to Defendant's case due to unfair surprise. It is irrelevant to the extent it reflects bank-to-bank activity, not upstream/downstream commercial navigation
P-0165	Annual Reports Index. "Rio Grande, Tex., examination and survey (1923) . . .".		*		Undisclosed evidence, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The annual reports index is not a document disclosed. It is prejudicial to Defendant's case due to unfair surprise. It is irrelevant to the extent it reflects bank-to-bank activity, not

						upstream/downstream commercial navigation
P-0175	Timothy L. MacAllister CV. Date: 05/08/2024.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0176	Letter from Andrew Knudsen, to Ryan Walters. Supplemental Expert Disclosure of Timothy MacAllister. Date: 05/29/2024.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0177	Expert Report of Timothy L. MacAllister.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0178	MacAllister Report p. 4.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0179	MacAllister Report p. 5.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable

					cumulative evidence	improvements, an issue which the USA concedes
P-0180	MacAllister Report p. 6.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0181	MacAllister Report p. 7.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0182	MacAllister Report p. 8.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0183	MacAllister Report p. 9.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0184	MacAllister Report Appendix A.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable

					cumulative evidence	improvements, an issue which the USA concedes
P-0185	Timothy L. MacAllister CV. Date: 05/29/2024.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes
P-0186	U.S. Army Corps of Engineers 24 - Hour Motorboat Training Testing and Licensing Manual.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The document is irrelevant to any of the claims or issues before the court
P-0187	Hydro-Electric Power Plants and Storage Dams.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The document is irrelevant to any of the claims or issues before the court
P-0188	Rio Grande Carrizo Cane Eradication Program.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The document is irrelevant to any of the claims or issues before the court
P-0189	Defendants' Objections and Answers to Plaintiff's First Set of Interrogatories. Date: 03/11/2024.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is superseded by subsequent amendments and irrelevant to the claims at issue in this case
P-0190	Timmel Report, Exhibit 1. Map of the Rio Grande Originating in Colorado and Extending Through New Mexico, Texas and Mexico Flowing into the Gulf of		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	There are already maps admitted reflecting the entire stretch of the Rio Grande River and, the entire length of the river is not at issue in this suit

	Mexico. Date: 05/09/2024.					
P-0191	Timmel Report, Exhibit 2. Aerial Photo of the Eagle Pass Segment of the Rio Grande with Texas's Marine Floating Barrier Visible on East Side of River. Date: 05/09/2024.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	the image does not reflect where the buoys are currently located
P-0192	Timmel Report, Exhibit 3. Buoy types. Date: 05/09/2024.		*		Lacks authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The image, which is not authenticated, relates to whether buoys are technically "buoys" or "floats," a fact that is not at issue in this suit
P-0193	Timmel Report, Exhibit 4. Pipeline and Floats for Dredge Pumping. Date: 05/09/2024.		*		Lacks authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The image, which is not authenticated, relates to whether buoys are technically "buoys" or "floats," a fact that is not at issue in this suit
P-0194	Timmel Report, Exhibit 5. Swimming Pool Floats. Exhibit 6. Marine Floating Barrier Floats. Date: 05/09/2024.		*		Lacks authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The image, which is not authenticated, relates to whether buoys are technically "buoys" or "floats," a fact that is not at issue in this suit
P-0195	Timmel Report, p. 21. Boom (Baum) Blocking the River Foyle During the Siege of Derry in 1689. Modern Day Cochrane Boom Blocking an Entrance to a Waterway. Date: 05/09/2024.		*		Lacks authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The image, which is not authenticated, relates to whether buoys are booms, an fact that is not at issue in this suit

P-0196	Timmel Report, Exhibit 7. Images of Old and New Boom Systems. Exhibit 7. Oil Containment Boom. Date: 05/09/2024.		*		Lacks authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The images (there are two "exhibit nos. 7" in Timmel's report) are not authenticated, contains multiple undated pictures that are not of the buoys in question and relate to whether the buoys are a boom, a fact that is not at issue
P-0197	Timmel Report, Exhibit 8. Workers Installing Marine Barrier Note Size and Low Height of Spheres Relative to Workers. Date: 05/09/2024.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	there are other images of the buoys in evidence and this image is irrelevant to any fact in dispute in this suit
P-0198	Timmel Report, Exhibit 9. Marine Floating Barrier Seen in its Entirety Near Shelby Park in Eagle Pass. Date: 05/09/2024.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	there are other images of the buoys in evidence and this image is irrelevant to any fact in dispute in this suit and it is unclear when the image was taken and if it reflects where the buoys are currently located
P-0199	Timmel Report, Exhibit 10. The Mooring Blocks of the Marine Floating Barrier Visible at Low River Level. Exhibit 11. U.S. CBP Airboat Inspecting Barrier Over the Top of One of the Concrete Mooring Blocks. Date: 05/09/2024.		*		Authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	there are other images of the buoys in evidence and this image is irrelevant to any fact in dispute in this suit and it is unclear when the image was taken and if it reflects where the buoys are currently located and the exhibit includes two separate images
P-0200	Timmel Report, Exhibit 12. Floating Barrier as Seen From East Bank (U.S. Side) of the		*		Authentication and relevance or, alternatively, undue	there are other images of the buoys in evidence and this image is irrelevant to any

	Rio Grande. Date: 05/09/2024.				delay, waste of time, needless presentation of cumulative evidence	fact in dispute in this suit and it is unclear when the image was taken and if it reflects where the buoys are currently located and the exhibit includes two separate images
P-0201	Timmel Report, Exhibit 13. Image of the Marine Floating Barrier Creating an Obstruction in the Eagle Pass Section of the Rio Grande. Date: 05/09/2024.		*		Authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence, prejudicial	there are other images of the buoys in evidence and this image is irrelevant to any fact in dispute in this suit and it is unclear when the image was taken and if it reflects where the buoys are currently located and the title of the exhibit is prejudicial
P-0202	Timmel Report, Exhibit 14. Aerial View of Marine Floating Barrier with Rough Estimates of Distances. Date: 05/09/2024.		*		Authentication and relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence, prejudicial	there are other images of the buoys in evidence and this image is irrelevant to any fact in dispute in this suit and it is unclear when the image was taken and if it reflects where the buoys are currently located and the document admits that it is no more than a rough estimate
P-0203	Timmel Report, Section VII. Documents, Materials, and Data Considered. Date: 05/09/2024.			*	Hearsay, unfair prejudice, bolstering, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	In addition to the obviously objectionable nature of the exhibit, Timmel testified at his deposition that he did not rely on any of these documents when forming his opinions in the case

P-0204	Timmel Report, Section VIII. Expert's C.V. Date: 05/09/2024.			*	none	
P-0205	Timmel Report, Section IX. Cases in Previous Five (5) Years in Which Expert Testified. Date: 05/09/2024.			*	none	
P-0206	Timmel Report, Section X. Additional Rule 26(A)(2) Disclosures. Date: 05/09/2024.			*	none	
P-0207	Aerial photograph of Floating Barrier construction.		*		None	
P-0208	Aerial photograph of Floating Barrier construction.		*		None	
P-0209	Aerial photograph of Floating Barrier construction.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0210	Aerial photograph of Floating Barrier construction.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0211	Aerial photograph of Floating Barrier construction.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time

P-0212	Aerial photograph of Floating Barrier construction.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0213	Mario Gomez Declaration p. 8.		*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	The map, which is unauthenticated, reflects an approximation of the buoys placement prior to their relocation and is entirely irrelevant to the issues before the court and no more than a waste of the courts time
P-0214	Mario Gomez Declaration p. 10.		*		none	
P-0215	Mario Gomez Declaration p. 11.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0216	Mario Gomez Declaration p. 12.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0217	Mario Gomez Declaration p. 14.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time

P-0218	Mario Gomez Declaration p. 15.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0219	Mario Gomez Declaration p. 16.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0220	Mario Gomez Declaration p. 17.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0221	Mario Gomez Declaration p. 19.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0222	Mario Gomez Declaration p. 20.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0223	Mario Gomez Declaration p. 21.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their

					cumulative evidence	relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0224	Photograph, Joseph Shelnut Declaration p.3.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0225	Photograph, Joseph Shelnut Declaration p.4.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0226	Memo from Joe Sheard, to HQDA. Navigability Study of the Rio Grande. Date: 03/31/1975.		*		Already in Evidence	This is a mutual exhibit already admitted into evidence see P-0163
P-0227	Evelio Siller Declaration p. 3.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0228	Evelio Siller Declaration p. 4.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their

					cumulative evidence	relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0229	Evelio Siller Declaration p. 5.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0230	Evelio Siller Declaration p. 6.		*		Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Pictures of the buoys are already in evidence, and the pictures depict the buoys' location prior to their relocation, and additional photos are needlessly cumulative, irrelevant, and a waste of time
P-0231	Photograph of Floating Barrier (PI Hearing Ex. G52).		*		none	Already in evidence
P-0232	Photograph of Floating Barrier (PI Hearing Ex. G53).		*		none	Already in evidence
P-0233	Photograph of Floating Barrier (PI Hearing G54).		*		none	Already in evidence
P-0234	Photograph of Floating Barrier (PI Hearing Ex. G55).		*		none	Already in evidence
P-0235	Photograph of Floating Barrier (PI Hearing Ex. G56).		*		none	Already in evidence

P-0236	Cochrane website. Maritime security marine floating barrier (PI Hearing Ex. G57).			*	none	Already in evidence
P-0237	Loren Flossman - PI Hearing Examination (excerpt).			*	none	Already in evidence
P-0238	Joseph Shelnutt - PI Hearing Examination (excerpt).			*	none	Already in evidence
P-0239	Objections and Responses to Plaintiff's First Set of Interrogatories. Date: 05/24/2024.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue in this case
P-0244	Water Resource Policies and Authorities Definition of Navigable Waters of the United States. Date: 09/11/1972.			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The en banc decision established the law of the case defining navigable waters thereby rendering this definition irrelevant
P-0245	Water Resource Policies and Authorities Definition of Navigability Policy, Practice and Procedure. Date: 12/15/1965.			*	Relevance and, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The en banc decision established the law of the case defining navigable waters thereby rendering this definition irrelevant
P-0246	Email from State Department, to "GhiottoPA@state.gov". Secretary Antony J. Blinken, Secretary of Homeland Security Alejandro Mayorkas, Attorney General Merrick Garland, White House Homeland Security Advisor Dr. Liz Sherwood-	DOS_0000170-185	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

	Randall, Mexican Secretary of Public Security and Citizen Protection Rosa Icela Rodri. Date: 10/05/2023.					
P-0247	Email from Alisla Simmons, to "PRM- WHA". Top Press in the Past 24 Hours. Date: 09/08/2023.	DOS_ 0000512-515		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0248	Email from Jennifer Pena, to Sally Spener. Follow up on my meeting with Resendez. Date: 07/18/2023.	DOS_ 0010473-475		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0249	Email from Victor Vazquez, to "Mexico City Tasker - INL", et al. AMLO daily press conference - August 1, 2023. Date: 08/01/2023.	DOS_ 0011942-972		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0250	Press conference with Antony Blinken and Alicia Barcena.	DOS_ 0012831-847		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0251	Email from Alex Osborne, to Jacqueline Westernen, et al. Piedras Negras. Date:	DOS_ 0012910-910		*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay, is unfair because Defendants cannot cross examine its

	07/20/2023.				delay, waste of time, needless presentation of cumulative evidence	recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0252	Email from Victor Vazquez, to "Mexico City Tasker - INL", et al. AMLO daily press conference - July 17, 2023. Date: 07/17/2023.	DOS_0012911-943		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0253	Letter from Veronica Escobar, et al, to Merrick Garland, Antony Blinken. Concern about the new aquatic barriers that Texas Governor Greg Abbott has deployed. Date: 07/13/2023.	DOS_0019869-871		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0254	Diplomatic note from Mexican Embassy, to Department of State. Response to diplomatic note regarding Texas activities within the Rio Grande bed in the Eagle Pass area. Date: 07/21/2023.	DOS_0031521-524		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0255	Spener, et al. HFAC Follow up Request for Brief --IBWC-1944 Treaty. Date: 08/31/2023.	DOS_0034847-848		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0257	Diplomatic note from Mexican Embassy, to Department of State. Activities being carried out by the United States in the	DOS_0035212-215		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time,	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is

	bed of the Rio Grande in the area of Eagle Pass. Date: 06/26/2023.				needless presentation of cumulative evidence	irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0258	Email from Shelu Patel, to Hillary Quam, et al. Rio Grande Buoy Barrier Deployment Information. Date: 07/11/2023.	DOS_0036698-700		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0259	Email from Colton Arciniaga, to Hillary Quam, et al. AMLO daily press conference - August 8, 2023. Date: 08/11/2023.	DOS_0046317-346		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0260	Information Note No. 04. Information note on the United States' activities on the Bravo River in the Eagle Pass area. Date: 07/14/2023.	DOS_0049686-687	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0261	Information Note No. 05. Information note on the second diplomatic note of the government of Mexico on Texas' activities in the pipeline of the Bravo River in the Eagle Pass area. Date: 07/26/2023.	DOS_0049688-689	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0262	Courtesy Translation of 7/14/23 SRE Information Note No. 4. Briefing Note on the U.S. Activities on the Rio Grande in the Eagle Pass,	DOS_0049690-690	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

	Texas Area. Date: 07/14/2023.				cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0263	Courtesy Translation of 7/26/23 SRE Information Note No. 5. Briefing Note on the second Diplomatic Note of the Government of Mexico on the activities being carried out by the Texas state authorities in the Rio Grande in the Eagle Pass area. Date: 07/26/2023.	DOS_0049691-692	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0264	Email from Ana Luisa Fajer Flores, to Rachel Poynter. Court ruling on the TX buoy barriers. Date: 09/06/2023.	DOS_0051018-018	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0265	Email from Sally Spener, to Francisco Sainz, et al. HFAC Follow up Request for Brief -- IBWC- 1944 Treaty. Date: 08/31/2023.	DOS_0069399-399		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0267	Email from David Buchholz, to Maxwell Hamilton. AMLO daily press conference - August 22, 2023. Date: 08/22/2023.	DOS_0073714-743		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0268	Email from Rachel Poynter, to Christopher Bodington, et al. For DAS Poynter: HFAC	DOS_0076618-618		*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay, is unfair because Defendants cannot cross examine its

	Brief on Mexico's Water Deliveries. Date: 08/18/2023.				delay, waste of time, needless presentation of cumulative evidence	recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0270	Email from Adam Sulewski, to Adam Sulewski. AMLO daily press conference - August 22, 2023. Date: 08/23/2023.	DOS_0105793-822		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0272	Email from Francisco Sainz, to Sally Spener, et al. HFAC Follow up Request for Brief -- IBWC- 1944 Treaty. Date: 08/31/2023.	DOS_0111660-660		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0273	Email from Maxwell Hamilton, to Francisco Sainz, et al. Concluding Rio Grande Minute Negotiation Sessions. Date: 09/20/2023.	DOS_0118607-608		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0274	Email from Sally Spener, to Maria Elena Griner, et al. Status of Rio Grande meetings? Date: 07/12/2023.	DOS_0118693-694		*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and not subject to an exception, and the document contains no facts relevant to the issues before the Court
P-0276	Email from "White House Press Office", to Richard Sonar. Press Briefing by Press Secretary Karine Jean-Pierre.	DOS_0122871-893		*	Hearsay, unfair prejudice, relevance and, alternatively, undue delay, waste of	Individual is not a testifying W, document is hearsay and not subject to an exception, and the document contains

	Date: 07/19/2023.				time, needless presentation of cumulative evidence	no facts relevant to the issues before the Court
P-0277	Email from Maxwell Hamilton, to Francisco Sainz, et al. HFAC Request for Brief -- IBWC- 1944 Treaty. Date: 08/18/2023.	DOS_ 0125211-213		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0278	Email from Brendan McGovern, to "WHA- MEX Only". WHA/MEX Daily Points, 12 June 2023." Date: 06/12/2023.	DOS_ 0145946-949		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0280	Email from Maxwell Hamilton, to David Buchholz, et al. AMLO daily press conference - August 22, 2023. Date: 08/22/2023.	DOS_ 0169645-674		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0281	Email from Maxwell Hamilton, to Hillary Quam, et al. Readout: HFAC Brief on TX Water Negotiations. Date: 09/08/2023.	DOS_ 0169712-713		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0282	Email from Sally Spener, to Francisco Sainz, et al. Follow up on my meeting with Resendez. Date: 07/18/2023.	DOS_ 0170381-383		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

					cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0283	Email from Francisco Sainz, to Maxwell Hamilton, et al. HFAC Request for Brief -- IBWC- 1944 Treaty. Date: 08/18/2023.	DOS_0174935-937	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0284	Email from Ken Salazar, to Mark Johnson, et al. AMLO daily press conference - July 26, 2023. Date: 07/27/2023.	DOS_0180615-636		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0286	Email from "International", to "mexcitysintesis@state.gov". English Language News/Aug 22, 2023/Evening. Date: 08/22/2023.	DOS_0186517-540		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0287	Email from David Suarez, to "Mexico City- Mananera Live". Mananera Live--United States omnibus: AMLO talks USMCA, Texas, Florida, fentanyl. Date: 08/22/2023.	DOS_0188419-420		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0288	Email from Luis Ramirez, to "Mexico City- Mananera Live". Mananera Live: AMLO sends letter praising POTUS; He blasts the UN. Date:	DOS_0188869-869		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

	08/09/2023.				cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0289	Email from Hillary Quam, to "Mexico City Tasker - POL", et al. AMLO daily press conference - August 28, 2023. Date: 08/28/2023.	DOS0193083-121		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0290	Diplomatic note from the Ministry of Foreign Affairs. Date: 08/17/2023.	DOS0193125-125	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0291	Email from Sally Spener, to "jgould@usbr.gov", et al. Can IBWC sign our Rio Grande Minute in Boulder City this week? Date: 12/11/2023.	IBWC0000384-384		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0292	Email from Sally Spener, to Maria Elena Giner, et al. Canceled: Rio Grande Minute Signing. Date: 12/15/2023.	IBWC0000387-387		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0293	Email from Sally Spener, to Maria Elena Giner, et al. Clarify text edits RE: New draft Rio Grande Minute for review/discussion this week.	IBWC0000394-396		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

	Date: 09/06/2023.				cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0294	Email from Sally Spener, to Francisco Sainz. Rio Grande Policy Work Group mid-summer update webinar - July 31 proposed. Date: 07/18/2023.	IBWC0000602-603		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0295	Email from Sally Spener, to Maria Elena Giner, et al. Status of Rio Grande meetings? Date: 07/12/2023.	IBWC0000614-615		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0296	Email from Sally Spener, to Francisco Sainz. Follow up on my meeting with Resendez. Date: 07/18/2023.	IBWC0000928-930		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0297	Email from Francisco Sainz, to Sally Spener, et al. HFAC Follow up Request for Brief --IBWC-1944 Treaty. Date: 08/31/2023.	IBWC0000951-951		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0298	Email from Sally Spener, to Krista Kyle. Postponed meeting with Chihuahua. Date: 07/18/2023.	IBWC0001052-053		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

					cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0299	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Field visit performed by this Mexican Section. Date: 06/09/2023.	IBWC0001603-605		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0300	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Follow up on 6/9/2023 letter. Date: 07/14/2023.	IBWC0001607-608		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0301	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Follow up on 6/9 and 7/14/2023 letters. Date: 07/26/2023.	IBWC0001610-611		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0302	Letter from Jose de Jesus Luevano Grano, to Maria-Elena Giner. Response to 8/10/2023 letter regarding activities carried out by the State of Texas. Date: 08/14/2023.	IBWC0001613-614		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0303	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 6/9/2023 letter regarding personnel, vehicles, and	IBWC0001623-623		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

	equipment observed within the Rio Grande. Date: 06/22/2023.				cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0304	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 7/26/2023 letter regarding construction activities carried out by the State of Texas. Date: 08/10/2023.	IBWC0001629-631		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0305	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 7/26/2023 letter regarding construction activities carried out by the State of Texas. Date: 08/10/2023.	IBWC0001632-633		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0306	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 08/14/2023 letter regarding construction activities carried out by the State of Texas. Date: 08/16/2023.	IBWC0001636-636		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0307	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Realignment of the barrier buoys undertaken by the State of Texas to move the buoys closer to the United States. Date: 09/13/2023.	IBWC0001640-658		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0308	Memo from John Claudio, to Ramon Macias III. Binational Survey of State of Texas buoys in Eagle Pass TX. Date: 08/30/2023.	IBWC0003233-239		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

					cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0309	Email from Ramon Macias, to Padinare Unnikrishna, et al. Report on floating barriers. Date: 07/26/2023.	IBWC0004998-002		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0310	Email from Maria Elena Giner, to Francisco Sainz, et al. Field Survey. Date: 07/26/2023.	IBWC0006070-070		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0311	Email from Francisco Sainz, to Jennifer Pena, et al. Field Survey. Date: 07/26/2023.	IBWC0006071-071		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0312	Email from Mario Castro, to Juan Uribe, et al. Survey boat safety check. Date: 07/19/2019.	IBWC0006866-867		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0313	Email from Mario Gomez, to Ramon Macias, et al. CILA survey at Eagle Pass. Date: 08/24/2023.	IBWC0008385-387		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at

					cumulative evidence	issue, and is needlessly cumulative of other evidence
P-0314	Email from Loren Flossman, to Victor Escalon, et al. River Floating Fence//Pontoon. Date: 02/23/2024.	STATE_003590-590		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0315	Texas Turns the Tide.	STATE_003624-635		*	none	
P-0316	Email from Madeleine Winslow, to Jeffrey Gilmore, et al. Cochrane//DPS 7.14.23. Date: 07/14/2023.	STATE_004028-029		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0317	Buoy Project End of Week Report 7.14.23. Date: 07/14/2023.	STATE_004030-035		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0318	Email from Loren Flossman, to Victor Escalon, et al. Floating your barrier System. Date: 09/30/2023.	STATE_004036-036		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0319	Email from Loren Flossman, to Victor Escalon, et al. Issues Passive discs between buoys. Date: 08/09/2023.	STATE_004041-041		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of

					cumulative evidence	other evidence
P-0320	Email from Isaac Gonzalez, to Madeleine Winslow, et al. Cochrane//DPS 7.14.23. Date: 07/14/2023.	STATE_004046-047		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0321	Email from Arturo Delagarza, to Loren Flossman, et al. RIVER FLOATING FENCE. Date: 02/23/2024.	STATE_004048-048		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0322	Email from Andrew Mahaleris, to Tabatha Vasquez, et al. WSJ request: border buoys. Date: 08/29/2023.	STATE_004049-052		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0323	Email from Coulter Tallent, to Tony Pena, et al. Border Update - 1045 CT, 14 Jun 2023. Date: 06/14/2023.	STATE_004056-057		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0324	Floating Barrier System (FBS) Evaluation Report Outbrief. Date: 09/14/2023.	STATE_004086-101		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0325	"8. Impacts from FBS to Agencies Operating Along the Rio Grande River".	STATE_004124-141		*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay and not subject to an exception and is irrelevant to

					delay, waste of time, needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0326	Floating Buoy Barrier Update to DPS Regional Director Victor Escalon.	STATE_004142-151		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0327	Texas Department of Public Safety. Floating Barrier System Evaluation Report. Date: 09/14/2023.	STATE_004184-221		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0328	Videoconference Deposition of Heather Lee Miller, PHD. Date: 07/01/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0329	Expert Report of Heather Lee Miller, PhD (Miller Dep. Ex. 1). Date: 06/14/2024.			*	none	
P-0330	Miller Dep. Ex. 2.			*	Hearsay, unfair prejudice, bolstering, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence, and duplicative	Author is a testifying W, document is hearsay and not subject to an exception, document is meant to bolster W testimony, and document contains no facts relevant to the issues before the Court, such as bank-to-bank ferry activity, and the document is misleadingly labeled Ex. 2 when, in fact, it is the expert report of Johnson that is separately

						being offered. This attempt to misleadingly offer the Johnson expert report as "Ex. 2" to Miller's report demonstrates bad faith on the part of the USA
P-0331	Deposition of F. Douglas Shields, Jr., PhD. Date: 07/01/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0332	"F.D. Shields' Testimony." (Shields Dep. Ex. 1)			*	none	
P-0333	Reasonableness of proposed improvement of the Rio Grande for navigation downstream of Amistad Dam (Shields Dep. Ex. 2). Date: 06/14/2024.			*	none	
P-0334	Funding and Managing the U.S. Inland Waterways System: hat Policy Makers Need to Know: What Policy Makers Need to Know (Shields Dep. Ex. 3). Date: 2015.			*	none	
P-0335	Engineering and Design Layout and Design of Shallow-Draft Waterways (Shields Dep. Ex. 4). Date: 07/31/1997.			*	none	
P-0336	Evaporative Losses from Major Reservoirs in Texas (Shields Dep. Ex. 5). Date: May 2021.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of

					cumulative evidence	other evidence
P-0337	Shields Dep. Ex. 6.			*	none	
P-0338	Deposition of Ancil Taylor. Date: 07/03/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0339	Expert Report of Ancil Taylor (Taylor Dep. Ex. 1). Date: 06/14/2024.			*	None	
P-0340	Data table (Taylor Dep. Ex. 2).			*	none	
P-0341	Barge Transportation (Taylor Dep. Ex. 3).			*	none	
P-0342	Taylor Dep. Ex. 4.			*	none	
P-0343	Taylor Dep. Ex. 5.			*	none	
P-0344	Taylor Dep. Ex. 6.			*	none	
P-0345	Taylor Dep. Ex. 7.			*	none	

P-0346	Oral Deposition of Kathy Ann Alexander, PhD. Date: 07/08/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0347	Letter from Johnathan Stone, to Brian Lynk. Identification of State Defendants' Anticipated Expert Witness. (Alexander Dep. Ex. 1). Date: 06/14/2024.			*	None	
P-0348	Water Code § 11.023. (Alexander Dep. Ex. 2) Date: 06/10/2019.			*	None	
P-0349	Water Code § 11.121. (Alexander Dep. Ex. 3) Date: 06/17/2015.			*	None	
P-0350	30TAC § 297.1. (Alexander Dep. Ex. 4) Date: 05/28/2020.			*	None	
P-0351	Water Code § 11.0235. (Alexander Dep. Ex. 5) Date: 09/01/2007.			*	None	
P-0352	Water Code § 11.096. (Alexander Dep. Ex. 6)			*	None	
P-0353	Deposition of Thomas Ciarametaro. Date: 07/09/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0354	Expert Witness Report. Prepared by Thomas P. Ciarametaro. (Ciarametaro Dep. Ex. 1) Date: 06/14/2024.			*	None	

P-0355	Thomas P. Ciarametaro, Jr. CV. (Ciarametaro Dep. Ex. 2)			*	none	
P-0356	Oral Deposition of Christine Marie Magers. Date: 07/09/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0357	Magers Dep. Ex. 1.			*	none	
P-0358	Magers Dep. Ex. 2.			*	Hearsay, unfair prejudice, Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence, duplicative	This individual is not listed as a testifying witness, the document is hearsay, and the witness's testimony relates to reasonable improvements, an issue which the USA concedes, this document is also the McAllister report and duplicative of a prior exhibit designation, albeit falsely labeled as a deposition exhibit
P-0359	Magers Dep. Ex. 3.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0360	Magers Dep. Ex. 4.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0361	Magers Dep. Ex. 6.			*	none	
P-0362	Oral Deposition of Carlos Rubinstein. Date: 07/09/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0363	Expert Report of Carlos Rubinstein & Herman R. Settemeyer. (Rubinstein Dep. Ex. 1).			*	none	
P-0364	Carolos Rubinstein CV. (Rubinstein Dep. Ex. 2).			*	none	
P-0365	Rio Grande/Rio Bravo River Basin (Rubinstein Dep. Ex. 3).			*	none	
P-0366	Water Code § 1.003. (Rubinstein Dep. Ex. 3). Date: 09/01/2011.			*	None	
P-0367	Oral Deposition of Michael Banks. Date: 07/10/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0368	Drone footage.			*	Vague; authenticity	No explanation as to substance or purpose of footage.
P-0369	Banks Dep. Ex. 3.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0370	Banks Dep. Ex. 4.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0371	Banks Dep. Ex. 5.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0372	Banks Dep. Ex. 6.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0373	Banks Dep. Ex. 7.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0374	Banks Dep. Ex. 8.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0375	Banks Dep. Ex. 9.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0376	Banks Dep. Ex. 10.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0377	Oral Deposition of Herman Robert Settemeyer. Date: 07/10/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0378	Herman Robert Settemeyer CV. (Settemeyer Dep. Ex. 2).			*	none	
P-0379	Oral Deposition of Eleftherios Iakovou, Ph.D. Date: 07/11/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0380	Expert Opinion Report Prepared by: Eleftherios Iakovou, Ph.D. (Iakovou Dep. Ex. 1). Date: 06/14/2024.			*	none	
P-0381	Email from Johnathan Stone, to Andrew Knudsen, et al. Terms re: Lefteris Dep. (Iakovou Dep. Ex. 2). Date: 07/11/2024.			*	None	
P-0382	Oral and Videotaped Deposition of Micky Donaldson. Date: 07/18/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0383	Donaldson Dep. Ex. A.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay and not subject to an exception and is irrelevant to

					delay, waste of time, needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0384	Donaldson Dep. Ex. B.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0385	Donaldson Dep. Ex. C.	US0002301-301	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0386	Donaldson Dep. Ex. D.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0387	Donaldson Dep. Ex. E.	CBP0000319-319		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0388	Donaldson Dep. Ex. F.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0389	Videotape Deposition of Margaret Gaffney- Smith. Date: 07/12/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in

						violation of the scheduling order
P-0390	Gaffney-Smith Dep. Ex. 1.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0391	33 CFR Part 329 Definition of Navigable Waters of the US. (Gaffney-Smith Dep. Ex. 3).			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0392	Aerial photo from drone footage.			*	Vague	No explanation as to substance or purpose of footage.
P-0393	Map.			*	Vague	No explanation as to substance or purpose of footage.
P-0394	Gaffney-Smith Dep. Ex. 6.			*	none	
P-0395	Aerial photo from drone footage.			*	Vague	No explanation as to substance or purpose of footage.
P-0396	Oral and Videotaped Deposition of Ivan Morua. Date: 07/18/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order

P-0397	Morua Dep. Ex. 1.			*	None	
P-0398	Morua Dep. Ex. 2.			*	None	
P-0399	Morua Dep. Ex. 3.			*	None	
P-0400	Videotaped Oral Deposition of Isela Canava. Date: 07/15/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0401	Defendants' Second Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Section of the International Boundary and Water Commission Pursuant to Rule 30(b)(6). (Canava Dep. Ex. 1). Date: 07/09/2024.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0402	Letter from Brian Lynk, to Ryan Walters. Fed. R. Civ. P. 30(b)(6) witness designations of USIBWC. (Canava Dep. Ex. 2). Date: 07/12/2024.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0403	Flood and Emergency Operations Manual Amistad Dam and Power Plant Project. Date: April 2024.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of

					cumulative evidence	other evidence
P-0404	International Boundary and Water Commission (IBWC) United States and Mexico U.S. Section. About Us. (Canava Dep. Ex. 4).			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0405	9 Stat. 928 (Feb. 2, 1848) -- Treaty with the Republic of Mexico, Article VII. (Canava Dep. Ex. 5). Date: 02/02/1848.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0406	United States v. Rio Grande Dam & Irrigation Co. 174 U.S. 690 (1899). (Canava Dep. Ex. 6). Date: 05/22/1899.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0407	Convention Between the United States of America and The United States of Mexico. (Canava Dep. Ex. 7). Date: 09/14/1886.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0408	Binational Border Solutions Strategic Plan Fiscal Years 2021 - 2025. (Canava Dep. Ex. 9). Date: Sept. 2022.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0409	International Boundary and Water Commission weighs in on new buoy system along the			*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay and not subject to an exception and is irrelevant to

	Rio Grande. (Canava Dep. Ex. 10). Date: 06/10/2023.				delay, waste of time, needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0410	IBWC wants to study Texas governor's plans to put buoys in middle of Rio Grande. (Canava Dep. Ex. 11). Date: 06/12/2023.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0411	The other border dispute is over an 80- year-old water treaty. (Canava Dep. Ex. 12). Date: 06/06/2024.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0412	Sinkholes in Amistad Dam threaten international border water reservoir. (Canava Dep. Ex. 13). Date: 12/20/2023.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0413	Status of Deliveries and New Minute. (Canava Dep. Ex. 14).			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0414	USIBWC Stream Gaging Program & Water Data Portal. (Canava Dep. Ex. 15). Date: 04/02/2024.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0415	30(b)(6) Videotape Deposition of the Coast Guard By and Through Retired Captain			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in

	Kevin Kiefer and Captain Michael Cintron. Date: 07/17/2024.					violation of the scheduling order
P-0416	Defendants' Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Coast Guard Pursuant to Rule 30(b)(6) (30(b)(6) Dep. Ex. 1). Date: 07/16/2024.			*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0417	Oral and Videotaped Deposition of Walker Smith. Date: 07/18/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0418	Smith Dep. Ex. 1.			*	none	
P-0419	Smith Dep. Ex. 2.			*	none	
P-0420	Smith Dep. Ex. 3.			*	none	
P-0421	Smith Dep. Ex. 4.			*	none	
P-0422	Smith Dep. Ex. 5.			*	none	
P-0423	Smith Dep. Ex. 6.			*	none	

P-0424	Smith Dep. Ex. 7.			*	none	
P-0425	Smith Dep. Ex. 7A.			*	none	
P-0426	Email from J.J. Harder, to Sean Torriente, et al. OS Law Enforcement Brief 21 July. Date: 07/21/2023.	DOS_0031501-501		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0427	Email from Mark Johnson, to Rachel Poynter, et al. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0035380-382		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0428	Email from Mark Johnson, to Brian Naranjo. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0050208-209		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0429	Email from Francisco Sainz, to Maxwell Hamilton, et al. HFAC Request for Brief -- IBWC- 1944 Treaty. Date: 08/18/2023.	DOS_0069265-266		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0430	Email from Mark Johnson, to Ken Salazar. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0118940-941		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0431	Email from Eric Jacobstein, to Mark Wells. Readout from Barcena dinner and bilat with S1. Date: 08/10/2023.	DOS_0120030-032		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0432	Email from Mark Johnson, to Ken Salazar. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0146320-320		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0434	Memo from "SECSTATE WASHDC". The Secretary's July 21 Conversation with Mexican FS Barcena. Date: 07/28/2023.	DOS_0199858-861	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0435	Memo from "SECSTATE WASHDC". The Secretary's August 10, 2023, Meeting with Mexican FS Barcena. Date: 08/17/2023.	DOS_0199862-870	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0436	Memo from "SECSTATE WASHDC". Secretary Blinken's Participation in the January 19, 2024 Migration Ministerial with Mexico. Date: 03/04/2024.	DOS_0199871-883	*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0437	Daily Activity Report. Date: 07/17/2023.	DOS_0199884-889	*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0438	Email from Francisco Sainz, to Francisco Sainz. Translation letter. Request intervention on the removal of barriers along the Rio Grande Floodplain. Date: 04/12/2024.	DOS0191798-798	*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0440	Email from Ramon Macias, to Padinare Unnikrishna, et al. Report on floating barriers. Date: 07/25/2023.	IBWC0004304-308	*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0441	Email from Jennifer Pena, to Sally Spener, et al. AMLO Comments on Rio Grande Barriers. Date: 07/27/2023.	IBWC0005709-710	*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0442	Email from Jennifer Pena, to Francisco Sainz, et al. UPDATE re: "inflatable" Wall on water? Date: 08/05/2023.	IBWC0006146-152		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0443	Email from Francisco Sainz, to Sally Spener, et al. News reports - TX buoys are in Mexico, Mx sends dip note RE: AMLO Comments on Rio Grande Barriers. Date: 07/27/2023.	IBWC0006687-690		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0444	Regulatory Decision Sheet. Date: 04/08/2002.	USACE0000113-235		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0445	Regulatory Decision Sheet. Date: 06/10/2002.	USACE0000241-294		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0446	Regulatory Actions.	USACE0000295-382		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0447	Regulatory Decision Sheet. Date: 10/29/1991.	USACE0000383-384		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is

					needless presentation of cumulative evidence	needlessly cumulative of other evidence
P-0448	Letter from Wayne Lea, to A. Brad Groves. Proposal by the city of Eagle Pass to construct a boat ramp and conduct bank stabilization work on the Rio Grande River. Date: 01/30/1991.	USACE0000385-390		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0449	Navigable Waters of the United States in the Fort Worth, Albuquerque, and Tulsa Districts Within the State of Texas. Date: 03/20/1999.	USACE0000502-502		*	None	
P-0450	USACE spreadsheet of TX permits.	USACE0006646-646		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay, is unfair because Defendants cannot cross examine its recipients and author, and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0451	Email from Neil Lebsock, to Calvin Kroeger. Chief's RFI. Date: 10/23/2023.	USACE0007998-001		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0452	Definition of Navigable Waters of the United States, 37 Fed. Reg. 18,289 (Sep. 9, 1972). Date: 09/09/1972.	USACE0008329-332		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not this document

					cumulative evidence	
P-0453	List of Bridges Over the Navigable Waters of the United States. Date: 1927.	USACE0008333-827		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0454	Granting consent of Congress to Texas- Coahuila Bridge Company for construction of a bridge across the Rio Grande between Eagle Pass, Texas, and Piedras Negras, Mexico. H.R. 4034, 69th Cong. (1926). Date: 02/02/1926.	USACE0009245-246		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0455	Bridge Across the Rio Grande at Eagle Pass, Tex. Report. Date: 04/19/1926.	USACE0009247-248		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0456	Title 33 - Navigation and Navigable Waters, Chapter II - Corps of Engineers, War Department. Date: 10/29/1946.	USACE0009249-251		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not this document
P-0457	Environmental Assessment for Facilities Expansion at Naval Nuclear Power Training Unit-Charleston (NPTU Charleston), Joint Base	USACE0009487-834		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of

	Charleston, South Carolina. Date: Sept. 2012.				cumulative evidence	other evidence
P-0458	RioGrande_Spatial_MAR1975 Date: March 1975.	USACE0011072-072		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0459	Environmental Handbook. Water Resources. Date: Aug. 2023.	USACE0011155-187		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not this document
P-0460	Email from Pete Crum, to "MRC - jpa Permits", et al. JPA SUBMITTAL: Norfolk Naval Shipyard (Portsmouth VA) - Waterfront Port Security Barrier System Installation. Date: 11/15/2016.	USACE0011392-413		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0461	Email from "MRC - jpa Permits", to Lou Atkins. MHI Lambert's Point Force Protection. Date: 08/17/2014.	USACE0011443-457		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0462	Letter from Stephen Decker, to Louis Pfingst. Department of the Army permit application to construct a Port Security Barrier. Date: 01/14/2015.	USACE0011473-475		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0463	Email from Jessica Barker, to "MRC - jpa Permits". Permit Application for the Installation of New Anchors for the Existing Port Security Barrier System at Naval Station Norfolk, Norfolk, VA. Date: 10/25/2012.	USACE0011488-500		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0464	Letter from Kimberly Prisco-Baggett, to W. David Noble. Department of the Army permit application to upgrade the existing Port Security Barrier system. Date: 04/09/2013.	USACE0011520-531		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0465	Email from Michael Anderson, to Marshall Smith, et al. Navy Waterfront Barrier at Naval Station. Date: 03/11/2013.	USACE0011533-536		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0466	Letter from J. Robert Hume, to Commander Navy Region. Proposed Barrier at the Norfolk Naval Base. Date: 02/10/2005.	USACE0011537-538		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0467	Email from Michael Anderson, to Stephen Powell, et al. Review of recent submittals from U.S. Navy (Waterfront Anti-Terrorism Barrier). Date: 03/11/2013.	USACE0011548-551		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0468	Email from Rebecca Francese, to "MRC - jpa Permits", et al. BAE Systems - Security	USACE0011556-567		*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay and not subject to an exception and is irrelevant to

	Barrier, Norfolk, VA. Date: 05/24/2013.				delay, waste of time, needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0469	Email from Justine Woodward, to Beth Howell. BAE Security Barrier - Section 408 Review. Date: 06/29/2015.	USACE0011568-580		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0470	Memorandum for Records. Department of the Army Memorandum Documenting General Permit Verification. Date: 09/15/2015.	USACE0011581-588		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0471	Memorandum for Record. Department of the Army Memorandum Documenting Nationwide Permit Verification/General Permit Verification. Date: 09/17/2013.	USACE0011589-622		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0472	Letter from Kimberly Prisco-Baggett, to Eddie Goldman. Department of the Army application to install 685 linear feet of security barrier. Date: 09/17/2013.	USACE0011623-630		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0473	Letter from Brian Denson, to Eddie Goldman. Department of the Army application to install 3,877 linear feet of a floating security barrier. Date: 09/15/2015.	USACE0011631-637		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0474	Memorandum for Record. Department of the Army Memorandum Documenting General Permit Verification. Date: 05/18/2015.	USACE0011742-746		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0475	Letter from Sage Joyce, to Michael Jones. Department of the Army application to temporarily install a 350 linear foot floating security barrier. Date: 05/18/2015.	USACE0011773-774		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0476	Letter from Robert Flowers, to Secretary of the Army. Gulf Intracoastal Waterway, Brazos River to Port O'Connor, Matagorda Bay Re-Route, Texas. Date: 12/24/2002.	USACE0011972-974		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0477	Fact Sheet. Intracoastal Waterway Jacksonville to Miami, FL. Date: May 2024.	USACE0011991-992		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0478	Fact Sheet. Atlantic Intracoastal Waterway - Norfolk to St. Johns. Date: May 2023.	USACE0011993-994		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0479	Fact Sheet Operation and Maintenance. Date: 04/02/2024.	USACE0011996-996		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0480	Fact Sheet Operation and Maintenance. Date: 04/02/2024.	USACE0011997-997		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0481	Fact Sheet Gulf Intracoastal Waterway, TX Operation and Maintenance. Date: 06/18/2024.	USACE0012004-007		*	none	
P-0482	The Gulf Intracoastal Waterway Project.	USACE0012011-014		*	none	
P-0483	Gulf Intracoastal Waterway (GIWW) Caloosahatchee River to Anclote River Dredge Readiness and Operation Plan (DROP). Date: 02/07/2019.	USACE0012015-039		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0484	Jacksonville District AIWW/IWW Update. Date: 11/13/2023.	USACE0012116-129		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0485	Atlantic Intracoastal Waterway Between <redacted> Norfolk, VA., and the St. Johns River, Florida. Date: 09/30/1996.	USACE0012131-132		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0486	Intracoastal Waterway, Jacksonville to Miami, Florida. Date: 09/30/1996.	USACE0012135-137		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of

					cumulative evidence	other evidence
P-0487	Olmsted Locks and Dam Project. Date: 10/05/2021.	USACE0012205-208		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0488	Photograph.	CBP0000067-067	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0489	DPS and TNG Deployment of Floating Barrier System. Date: 06/14/2023.	CBP0000089-090	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0490	Photograph.	CBP0000232-232	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0491	Email. Daily Report - Water Buoy. Date: 07/11/2023.	CBP0000252-253	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0492	Buoy Project Daily Report 7.10.2023. Date: 07/10/2023.	CBP0000254-259	*		Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay and not subject to an exception and is irrelevant to

					delay, waste of time, needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0493	Cochrane//DPS Weekly Check In 7.21.23. Date: 07/21/2023.	CBP0000262-263	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0494	DPS//Cochrane Weekly Check In 7.21.23. Date: 07/21/2023.	CBP0000264-269	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0495	Turn the Tide.	CBP0000271-281	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0496	Photograph.	CBP0000329-329	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0497	Email to "DRS-SBPA". Situational Awareness: DPS Buoys in EGT AO. Date: 07/14/2023.	CBP0000766-766	*		Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0498	Photograph.	CBP0000771-771	*		Authentication, relevance or, alternatively, undue	Document lacks authentication, irrelevant to the claims at issue, and is

					delay, waste of time, needless presentation of cumulative evidence	needlessly cumulative of other evidence
P-0499	Photograph.	CBP0000772-772	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0500	Photograph.	CBP0000773-773	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0501	Photograph.	CBP0000774-774	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0502	Photograph.	CBP0000775-775	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0503	Photograph.	CBP0000776-776	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0504	Photograph.	CBP0000777-777	*		Authentication, relevance or, alternatively, undue	Document lacks authentication, irrelevant to the claims at issue, and is

					delay, waste of time, needless presentation of cumulative evidence	needlessly cumulative of other evidence
P-0505	Photograph.	CBP0000778-778	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0506	Photograph.	CBP0000798-798	*		Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document lacks authentication, irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0507	Memo from Maria-Elena Giner, to Adrianna Resendez Maldonado. Regarding activities carried out by the State of Texas in the Rio Grande channel in the area of Eagle Pass, Texas. Date: 07/28/2023.	IBWC0004404-405		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0508	Ancil Taylor Supplemental Report Spreadsheet. Date: 07/01/2024.			*	none	
P-0509	John Timmel Site Visit Photograph.	US0003573-573		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0510	John Timmel Site Visit Photograph.	US0003574-574		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0511	John Timmel Site Visit Photograph.	US0003575-575		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0512	John Timmel Site Visit Photograph.	US0003576-576		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0513	John Timmel Site Visit Photograph.	US0003577-577		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0514	John Timmel Site Visit Photograph.	US0003578-578		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0515	John Timmel Site Visit Photograph.	US0003579-579		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0516	John Timmel Site Visit Photograph.	US0003580-580		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0517	John Timmel Site Visit Photograph.	US0003581-581		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0518	John Timmel Site Visit Photograph.	US0003582-582		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0519	John Timmel Site Visit Photograph.	US0003583-583		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0520	John Timmel Site Visit Photograph.	US0003584-584		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0521	John Timmel Site Visit Photograph.	US0003585-585		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0522	John Timmel Site Visit Photograph.	US0003586-586		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0523	John Timmel Site Visit Photograph.	US0003587-587		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0524	John Timmel Site Visit Photograph.	US0003588-588		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0525	John Timmel Site Visit Photograph.	US0003589-589		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0526	John Timmel Site Visit Photograph.	US0003590-590		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0527	John Timmel Site Visit Photograph.	US0003591-591		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0528	John Timmel Site Visit Photograph.	US0003592-592		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0529	John Timmel Site Visit Photograph.	US0003593-593		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0530	John Timmel Site Visit Photograph.	US0003594-594		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0531	John Timmel Site Visit Photograph.	US0003595-595		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0532	John Timmel Site Visit Photograph.	US0003596-596		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0533	John Timmel Site Visit Photograph.	US0003597-597		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0534	John Timmel Site Visit Photograph.	US0003598-598		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0535	John Timmel Site Visit Photograph.	US0003599-599		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0536	John Timmel Site Visit Photograph.	US0003600-600		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0537	John Timmel Site Visit Photograph.	US0003601-601		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0538	John Timmel Site Visit Photograph.	US0003602-602		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0539	John Timmel Site Visit Photograph.	US0003603-603		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0540	John Timmel Site Visit Video.	US0003604-604		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0541	John Timmel Site Visit Video.	US0003605-605		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0542	John Timmel Site Visit Video.	US0003606-606		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0543	Mike Chapman Site Visit Photograph.	US0003607-607		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0544	Mike Chapman Site Visit Photograph.	US0003608-608		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0545	Mike Chapman Site Visit Photograph.	US0003609-609		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0546	Mike Chapman Site Visit Photograph.	US0003610-610		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0547	Mike Chapman Site Visit Photograph.	US0003611-611		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0548	Mike Chapman Site Visit Photograph.	US0003612-612		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0549	Mike Chapman Site Visit Photograph.	US0003613-613		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0550	Mike Chapman Site Visit Photograph.	US0003614-614		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0551	Mike Chapman Site Visit Photograph.	US0003615-615		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0552	Mike Chapman Site Visit Photograph.	US0003616-616		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0553	Mike Chapman Site Visit Photograph.	US0003617-617		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0554	Mike Chapman Site Visit Photograph.	US0003618-618		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0555	Mike Chapman Site Visit Photograph.	US0003619-619		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0556	Mike Chapman Site Visit Photograph.	US0003620-620		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0557	Mike Chapman Site Visit Photograph.	US0003621-621		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0558	Mike Chapman Site Visit Photograph.	US0003622-622		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0559	Mike Chapman Site Visit Photograph.	US0003623-623		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0560	Mike Chapman Site Visit Photograph.	US0003624-624		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0561	Mike Chapman Site Visit Photograph.	US0003625-625		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0562	Mike Chapman Site Visit Photograph.	US0003626-626		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0563	Mike Chapman Site Visit Photograph.	US0003627-627		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0564	Mike Chapman Site Visit Photograph.	US0003628-628		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0565	Mike Chapman Site Visit Photograph.	US0003629-629		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0566	Mike Chapman Site Visit Photograph.	US0003630-630		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0567	Mike Chapman Site Visit Photograph.	US0003631-631		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0568	Mike Chapman Site Visit Photograph.	US0003632-632		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0569	Mike Chapman Site Visit Photograph.	US0003633-633		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0570	Mike Chapman Site Visit Photograph.	US0003634-634		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0571	Mike Chapman Site Visit Photograph.	US0003635-635		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0572	Mike Chapman Site Visit Photograph.	US0003636-636		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0573	Mike Chapman Site Visit Photograph.	US0003637-637		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0574	Mike Chapman Site Visit Photograph.	US0003638-638		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0575	Mike Chapman Site Visit Photograph.	US0003639-639		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0576	Mike Chapman Site Visit Photograph.	US0003640-640		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0577	Mike Chapman Site Visit Photograph.	US0003641-641		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0578	Mike Chapman Site Visit Photograph.	US0003642-642		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0579	Mike Chapman Site Visit Photograph.	US0003643-643		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0580	Mike Chapman Site Visit Photograph.	US0003644-644		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0581	Mike Chapman Site Visit Photograph.	US0003645-645		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0582	Mike Chapman Site Visit Photograph.	US0003646-646		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0583	Mike Chapman Site Visit Photograph.	US0003647-647		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0584	Mike Chapman Site Visit Photograph.	US0003648-648		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0585	Mike Chapman Site Visit Photograph.	US0003649-649		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0586	Mike Chapman Site Visit Photograph.	US0003650-650		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0587	Mike Chapman Site Visit Photograph.	US0003651-651		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0588	Mike Chapman Site Visit Photograph.	US0003652-652		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0589	Mike Chapman Site Visit Photograph.	US0003653-653		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0590	Mike Chapman Site Visit Photograph.	US0003654-654		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0591	Mike Chapman Site Visit Photograph.	US0003655-655		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0592	Mike Chapman Site Visit Photograph.	US0003656-656		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0593	Mike Chapman Site Visit Photograph.	US0003657-657		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0594	Mike Chapman Site Visit Photograph.	US0003658-658		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0595	Mike Chapman Site Visit Photograph.	US0003659-659		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0596	Mike Chapman Site Visit Photograph.	US0003660-660		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0597	Mike Chapman Site Visit Photograph.	US0003661-661		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0598	Mike Chapman Site Visit Photograph.	US0003662-662		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0599	Mike Chapman Site Visit Photograph.	US0003663-663		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0600	Mike Chapman Site Visit Photograph.	US0003664-664		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0601	Mike Chapman Site Visit Photograph.	US0003665-665		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0602	Mike Chapman Site Visit Photograph.	US0003666-666		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0603	Mike Chapman Site Visit Photograph.	US0003667-667		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0604	Mike Chapman Site Visit Photograph.	US0003668-668		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0605	Mike Chapman Site Visit Photograph.	US0003669-669		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0606	Mike Chapman Site Visit Photograph.	US0003670-670		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0607	Mike Chapman Site Visit Photograph.	US0003671-671		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0608	Mike Chapman Site Visit Photograph.	US0003672-672		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0609	Mike Chapman Site Visit Photograph.	US0003673-673		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0610	Mike Chapman Site Visit Photograph.	US0003674-674		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0611	Mike Chapman Site Visit Photograph.	US0003675-675		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0612	Mike Chapman Site Visit Photograph.	US0003676-676		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0613	Mike Chapman Site Visit Photograph.	US0003677-677		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0614	Mike Chapman Site Visit Photograph.	US0003678-678		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0615	Mike Chapman Site Visit Photograph.	US0003679-679		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0616	Mike Chapman Site Visit Photograph.	US0003680-680		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0617	Mike Chapman Site Visit Photograph.	US0003681-681		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0618	Mike Chapman Site Visit Photograph.	US0003682-682		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0619	Mike Chapman Site Visit Photograph.	US0003683-683		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0620	Mike Chapman Site Visit Photograph.	US0003684-684		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0621	Mike Chapman Site Visit Photograph.	US0003685-685		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0622	Mike Chapman Site Visit Photograph.	US0003686-686		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0623	Mike Chapman Site Visit Photograph.	US0003687-687		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0624	Mike Chapman Site Visit Photograph.	US0003688-688		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0625	Mike Chapman Site Visit Photograph.	US0003689-689		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0626	Mike Chapman Site Visit Photograph.	US0003690-690		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0627	Mike Chapman Site Visit Photograph.	US0003691-691		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0628	Mike Chapman Site Visit Photograph.	US0003692-692		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0629	Tim MacAllister Site Visit Photograph.	US0003804-804		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence

P-0630	Tim MacAllister Site Visit Photograph.	US0003805-805		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0631	Tim MacAllister Site Visit Photograph.	US0003806-806		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0632	Tim MacAllister Site Visit Photograph.	US0003807-807		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0633	Tim MacAllister Site Visit Photograph.	US0003808-808		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0634	Tim MacAllister Site Visit Photograph.	US0003809-809		*	Authentication, relevance or, alternatively, undue delay, waste of time,	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of

					needless presentation of cumulative evidence	other evidence because there are already photographs and videos of the buys in evidence
P-0635	Benjamin Johnson Site Visit Photograph.	US0003810-810		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0651	Benjamin Johnson Site Visit Photograph.	US0003826-826		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence because there are already photographs and videos of the buys in evidence
P-0661	Letter from Crawford Martin, to J.R. Singleton. Liability of State for injuries caused by bulkhead bounding San Jacinto State Park & Houston Ship Channel and State's recourse against Corps of Engineers who maintain Houston Ship Channel. Date: 05/01/1969.	US0003919-923		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0662	Letter from Crawford Martin, to John Allen. State and Federal Relations as to Texas streams -- both as to projects and water uses. Date: 11/24/1970.	US0003924-933		*	Hearsay, unfair prejudice, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0663	Letter from Charles Lind, to James Morris. Whether a navigable bayou	US0003934-938		*	Hearsay, unfair prejudice, relevance or, alternatively, undue	This document is hearsay and not subject to an exception and is irrelevant to

	located wholly in Orange County, Texas, is subject to the provisions of the River and Harbor Act of Congress, and also whether the construction across said bayou of a fixed span bridge with a vertical clearance of 35 feet is taking of property for which the State or County would be liable to an upstream landowner whose ships require a minimum vertical clearance of 55 feet. Date: 12/31/1964.				delay, waste of time, needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0664	PI Hearing Transcript. Date: 08/22/2023.			*	none	Already in evidence.
P-0665	Oral and Videotaped Deposition of Neil Lebsack. Date: 07/08/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0667	Plaintiff's Amended Response to Defendants' First Set of Interrogatories to Plaintiff. (Lebsack Dep. Ex. 2). Date: 05/03/2024.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is superseded by subsequent amendments and irrelevant to the claims at issue in this case
P-0668	Oral Videotaped Deposition Hillary Quam. Date: 07/09/2024.			*	Hearsay	Document is hearsay and does not comply with FRCP 32 and not designated in violation of the scheduling order
P-0669	Treaty and Non-Treaty Mechanisms for Resolving the Rio Grande River Water Debt Dilemma. (Quam Dep. Ex. 1).			*	none	

	Date: 12/12/2022.					
P-0670	Mexico-U.S. Joint Communique: Mexico and the United States Reaffirm Their Shared Commitments on an Orderly, Humane and Regular Migration. (Quam Dep. Ex. 2). Date: 12/28/2023.			*	none	
P-0671	Operation Lone Star. Date: July 2023.	STATE_004380-388		*	none	
P-0672	Operation Lone Star. Date: July 2023.	STATE_004547-555		*	none	
P-0673	Operation Lone Star. Date: July 2023.	STATE_004571-579		*	none	
P-0674	Email TF Eagle River Barrier Storyboard. Date: 02/02/2023.	STATE_004694-695		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0675	River Barrier Survey. Date: Feb. 2023.	STATE_004696-697		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0676	River Barrier Survey. Date: Feb. 2023.	STATE_004698-699		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is

					cumulative evidence	needlessly cumulative of other evidence
P-0677	Email DPS Buoy Proposal. Date: 04/03/2023.	STATE_004700-740		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0678	Turn the Tide.	STATE_004761-771		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0679	Texas Turns the Tide.	STATE_004772-789		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0680	River Barrier Survey. Date: 02/01/2023.	STATE_004790-791		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0681	River Barrier Survey. Date: 02/01/2023.	STATE_004794-795		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0682	Email DPS//Cochrane Weekly Check In 6.9.2023. Date: 06/10/2023.	STATE_004801-803		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0683	Memo Trip Report from J5 Team visit to TF Eagle Area of Operations (AO). Date: 05/04/2023.	STATE_004824-826		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0684	Memo Trip Report from J5 Team visit to TF Eagle Area of Operations (AO). Date: 05/04/2023.	STATE_004829-831		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0685	Operation Lone Star. Date: March 2024.	STATE_004985-993		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0686	Operation Lone Star. Date: March 2024.	STATE_005003-012		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0687	Email Boat Information. Date: 12/01/2023.	STATE_005071-072		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0688	Coastal Bend Airboats invoice. Date: 05/30/2023.	STATE_005073-074		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0689	Transport Boats invoice. Date: 06/07/2023.	STATE_005075-076		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0690	Email Boats. Date: 12/01/2023.	STATE_005077-078		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0691	EmbeddedFile6.xlsx	STATE_005169-169		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0692	Operation Lone Star. Date: June 2023.	STATE_005811-820		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0693	Email JTF-LS 200900JUL2023 COP Date: 07/20/2023.	STATE_005876-881		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0694	Email JTF-LS 210900JUL2023 COP Date: 7/21/2023.	STATE_006013-018		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0695	Operation Lone Star. Date: June 2023.	STATE_006324-333		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0696	Email JTF-LS 250900JAN2024 COP Date: 01/25/2024.	STATE_006496-502		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0697	Email JTF-LS 300900JUL2023 COP Date: 07/30/2023.	STATE_007059-064		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0698	CONOP: Operation Flat Top. Date: 09/12/2023.	STATE_007205-205		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0699	Email Buoy Info Eagle Pass. Date: 06/16/2023.	STATE_007901-902		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0700	Email DPS//Cochrane Weekly Check In 6.16.2023. Date: 06/20/2023.	STATE_007906-908		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0701	Email River Barrier Survey. Date: 02/02/2023.	STATE_007936-937		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0702	River Barrier Survey. Date: 02/01/2023.	STATE_007938-939		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0703	Email Border Protection Alternative Technologies. Date: 01/04/2023.	STATE_007963-965		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0704	Operation Lone Star. Date: Sept. 2023.	STATE_008254-263		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0705	Operation Lone Star. Date: Aug. 2023.	STATE_008272-280		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0706	Operation Lone Star. Date: April 2023.	STATE_008289-298		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0707	Operation Lone Star. Date: July 2023.	STATE_008338-346		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0708	Operation Lone Star. Date: June 2023.	STATE_008353-363		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0709	Operation Lone Star. Date: May 2023.	STATE_008392-401		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0710	Operation Lone Star. Date: Aug. 2023.	STATE_008405-413		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0711	Operation Lone Star. Date: Dec. 2023.	STATE_008417-425		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0712	Operation Lone Star. Date: Feb. 2024.	STATE_008431-439		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0713	Email JTF-LS 020900JAN2024. Date: 01/02/2024.	STATE_008440-446		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0714	Operation Lone Star. Date: Jan. 2024.	STATE_008449-457		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0715	Operation Lone Star. Date: Nov. 2023.	STATE_008466-475		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0716	Email JTF-LS 020900OCT2023 COP. Date: 10/02/2023.	STATE_008476-481		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0717	Operation Lone Star. Date: Sep. 2023.	STATE_008497-506		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0718	Operation Lone Star. Date: April 2023.	STATE_008515-524		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0719	Operation Lone Star. Date: June 2023.	STATE_008566-575		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0720	Operation Lone Star. Date: Dec. 2023.	STATE_008616-624		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0721	Operation Lone Star. Date: Nov. 2023.	STATE_008640-649		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0722	Operation Lone Star. Date: Oct. 2023.	STATE_008653-662		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0723	Operation Lone Star. Date: Sep. 2023.	STATE_008666-675		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0724	Email JTF-LS 040700APR2023 COP. Date: 04/04/2023.	STATE_008676-677		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0725	Operation Lone Star. Date: April 2023.	STATE_008684-693		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0726	Operation Lone Star. Date: June 2023.	STATE_008735-744		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0727	Operation Lone Star. Date: May 2023.	STATE_008771-780		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0728	Operation Lone Star. Date: Aug. 2023.	STATE_008784-792		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0729	Email JTF-LS 040900DEC2023 COP - UNCLASSIFIED - 2023-12-04T14_38_48_730Z Date: 12/04/2023.	STATE_008793-799		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0730	Operation Lone Star. Date: Dec. 2023.	STATE_008802-810		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0731	Operation Lone Star. Date: Nov. 2023.	STATE_008832-841		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0732	Operation Lone Star. Date: Oct. 2023.	STATE_008845-854		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0733	Operation Lone Star. Date: April 2023.	STATE_008863-872		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0734	Operation Lone Star. Date: June 2023.	STATE_008912-921		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0735	Operation Lone Star. Date: June 2023.	STATE_008948-957		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0736	Operation Lone Star. Date: Aug. 2023.	STATE_008961-969		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0737	Operation Lone Star. Date: Dec. 2023.	STATE_008974-982		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0738	Email JTF-LS 050900JUL2023 COP. Date: 07/05/2023.	STATE_008995-999		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0739	Operation Lone Star. Date: July 2023.	STATE_009002-010		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0740	Operation Lone Star. Date: Nov. 2023.	STATE_009014-023		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0741	Operation Lone Star. Date: Oct. 2023.	STATE_009032-041		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0742	Operation Lone Star. Date: Sep. 2023.	STATE_009045-054		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0743	Operation Lone Star. Date: April 2023.	STATE_009063-072		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0744	Operation Lone Star. Date: June 2023.	STATE_009112-121		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0745	Operation Lone Star. Date: May 2023.	STATE_009148-157		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0746	Operation Lone Star. Date: Aug. 2023.	STATE_009161-169		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0747	Operation Lone Star. Date: Dec. 2023.	STATE_009174-182		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0748	Operation Lone Star. Date: Jan. 2024.	STATE_009184-192		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0749	Email JTF-LS 060900NOV2023 CDRs SITREP. Date: 11/06/2023.	STATE_009203-208		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0750	Operation Lone Star. Date: Oct. 2023.	STATE_009224-233		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0751	Operation Lone Star. Date: Sep. 2023.	STATE_009237-246		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0752	Operation Lone Star. Date: April 2023.	STATE_009255-264		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0753	Operation Lone Star. Date: June 2023.	STATE_009305-314		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0754	Operation Lone Star. Date: May 2023.	STATE_009335-344		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0755	Operation Lone Star. Date: Aug. 2023.	STATE_009366-374		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0756	Operation Lone Star. Date: Dec. 2023.	STATE_009384-392		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0757	Operation Lone Star. Date: Jan. 2024.	STATE_009394-402		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0758	Operation Lone Star. Date: Nov. 2023.	STATE_009416-425		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0759	Operation Lone Star. Date: Oct. 2023.	STATE_009430-439		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0760	Operation Lone Star. Date: Sep. 2023.	STATE_009448-457		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0761	Operation Lone Star. Date: April 2023.	STATE_009466-475		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0762	Operation Lone Star. Date: May 2023.	STATE_009551-560		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0763	Operation Lone Star. Date: Aug. 2023.	STATE_009564-572		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0764	Operation Lone Star. Date: Dec. 2023.	STATE_009576-584		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0765	Email JTF-LS 080900DEC2024 CDR SITREP. Date: 01/08/2024.	STATE_009585-592		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0766	Operation Lone Star. Date: Jan. 2024.	STATE_009595-603		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0767	Email JTF-LS 080900JUL2023 COP. Date: 07/08/2023.	STATE_009604-608		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0768	Operation Lone Star. Date: July 2023.	STATE_009611-619		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0769	Email JTF-LS 090700APR2023 COP. Date: 04/09/2023.	STATE_009659-660		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0770	Operation Lone Star. Date: May 2023.	STATE_009740-749		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0771	Operation Lone Star. Date: Aug. 2023.	STATE_009753-761		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0772	Operation Lone Star. Date: Jan. 2024.	STATE_009777-785		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0773	Email JTF-LS 090900NOV2023 COP - _UNCLASSIFIED - 2023-11- 09T14_54_10_820Z_. Date: 11/09/2023.	STATE_009786-792		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0774	Operation Lone Star. Date: Nov. 2023.	STATE_009795-804		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0775	Email JTF-LS 090900OCT2023 COP. Date: 10/09/2023.	STATE_009805-810		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0776	Operation Lone Star. Date: Oct. 2023.	STATE_009813-822		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0777	Operation Lone Star. Date: June 2023.	STATE_009895-904		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0778	Operation Lone Star. Date: April 2023.	STATE_010012-021		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0779	Operation Lone Star. Date: June 2023.	STATE_010063-072		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0780	Email JTF-LS 110900DEC2023 COP - UNCLASSIFIED - 2023-12-11T15_11_00_100Z_. Date: 12/11/2023.	STATE_010121-126		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0781	Email JTF-LS 110900DEC2024 CDR SITREP. Date: 01/11/2024.	STATE_010139-145		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0782	Email JTF-LS 110900SEP2023 COP. Date: 09/11/2023.	STATE_010184-189		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0783	Email JTF-LS 120700APR2023 COP. Date: 04/12/2023.	STATE_010202-203		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0784	Operation Lone Star. Date: April 2023.	STATE_010210-219		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0785	Operation Lone Star. Date: June 2023.	STATE_010262-271		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0786	Operation Lone Star. Date: May 2023.	STATE_010296-305		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0787	Email JTF-LS 120900OCT2023 COP. Date: 10/12/2023.	STATE_010351-356		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0788	Operation Lone Star. Date: April 2023.	STATE_010391-400		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0789	Operation Lone Star. Date: June 2023.	STATE_010443-452		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0790	Email JTF-LS 130700MAY2023 COP. Date: 05/13/2023.	STATE_010471-472		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0791	Operation Lone Star. Date: May 2023.	STATE_010473-476		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0792	Operation Lone Star. Date: May 2023.	STATE_010477-486		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0793	Email JTF-LS 130900DEC2023 COP - _UNCLASSIFIED - 2023-12-01T13_53_28_724Z_. Date: 12/13/2023.	STATE_010499-499		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0794	Operation Lone Star. Date: Dec. 2023.	STATE_010500-501		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0795	Operation Lone Star. Date: Dec. 2023.	STATE_010502-510		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0796	Email JTF-LS 130900JAN2024 COP. Date: 01/13/2024.	STATE_010511-511		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0797	Operation Lone Star. Date: Jan. 2024.	STATE_010512-520		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0798	EmbeddedFile1.xlsx	STATE_010521-521		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0799	EmbeddedFile2.xlsx	STATE_010522-522		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0800	EmbeddedFile3.xlsx	STATE_010523-523		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0801	EmbeddedFile4.xlsx	STATE_010524-524		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0802	EmbeddedFile5.xlsx	STATE_010525-525		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0803	EmbeddedFile6.xlsx	STATE_010526-526		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0804	EmbeddedFile7.xlsx	STATE_010527-527		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0805	EmbeddedFile8.xlsx	STATE_010528-528		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0806	Operation Lone Star. Date: Jan. 2024.	STATE_010529-530		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0807	Email JTF-LS 130900NOV2023 COP - UNCLASSIFIED - 2023-11-13T14_58_18_916Z_. Date: 11/13/2023.	STATE_010531-536		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0808	Operation Lone Star. Date: Nov. 2023.	STATE_010537-538		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0809	Operation Lone Star. Date: Nov. 2023.	STATE 010539-548		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0810	Email JTF-LS 130900OCT2023 COP. Date: 10/13/2023.	STATE 010549-550		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0811	Operation Lone Star. Date: Oct. 2023.	STATE 010551-552		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0812	Operation Lone Star. Date: Oct. 2023.	STATE 010553-562		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0813	Email JTF-LS 130900SEP2023 COP. Date: 09/13/2023.	STATE 010563-563		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0814	Operation Lone Star. Date: Sep. 2023.	STATE 010564-565		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0815	Operation Lone Star. Date: Sep. 2023.	STATE_010566-575		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0816	Email JTF-LS 140700APR2023 COP. Date: 04/14/2023.	STATE_010576-577		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0817	Operation Lone Star. Date: June 2023.	STATE_010634-643		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0818	Operation Lone Star. Date: March 2024.	STATE_011994-003		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0819	Operation Lone Star. Date: March 2024.	STATE_012108-117		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0820	EmbeddedFile6.xlsx	STATE_012123-123		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0821	EmbeddedFile7.xlsx	STATE_012124-124		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0822	Operation Lone Star. Date: Feb. 2024.	STATE_013265-279		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0823	Operation Lone Star. Date: Nov. 2023.	STATE_013293-308		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0824	Operation Lone Star. Date: Oct. 2023.	STATE_013309-318		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0825	Operation Lone Star. Date: Feb. 2024.	STATE_013395-403		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0826	Operation Lone Star. Date: Nov. 2023.	STATE_013693-702		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0827	Email Floating Barrier info added to daily SITREP. Date: 07/17/2023.	STATE_016996-996		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0828	Email Left/Right Seat - LNO SITREP to TF CDR. Date: 04/14/2023.	STATE_016997-059		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0829	Buoy Barrier Debrief for Texas DPS. Date: 09/14/2023.	COCHRANE_0000003-254		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0830	DPS - Project Rio. Date: 05/29/2023.	COCHRANE_0000017-032		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0831	Assembly Step 1.	COCHRANE_0000033-053		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0832	Concrete Anchor Rebar. Date: 05/25/2023.	COCHRANE_0000054-055		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0833	Texas Turns the Tide.	COCHRANE_0000057-073		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0834	Aerial photograph.	COCHRANE_0000074-074		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0835	Aerial photograph.	COCHRANE_0000075-075		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0836	Texas Turns the Tide.	COCHRANE_0000076-087		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0837	Texas Department of Public Safety. Date: 09/14/2023.	COCHRANE_0000088-238		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0838	Floating Barrier System (FBS) Evaluation Report Outbrief. Date: 09/14/2023.	COCHRANE_0000239-254		*	Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is hearsay and not subject to an exception and is irrelevant to

					needless presentation of cumulative evidence	the claims at issue, and is needlessly cumulative of other evidence
P-0839	Photograph.	COCHRANE_0000257-306		*	Authentication, hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0840	Cochrane USA invoice. Date: 04/18/2023.	COCHRANE_0000267-267		*	Authentication, hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0841	Negotiated Terms and Conditions for Contract 2958 Cochrane Barrier Buoy. Date: 06/22/2023.	COCHRANE_0000268-298		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0842	Cochrane's Terms and Conditions Negotiated pjs 06-22-2023. Date: 06/22/2023.	COCHRANE_0000299-303		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0843	Subpoena to Produce Documents, Information, or Objects or to Permit inspection of Premises in a Civil Action. Date: 03/28/2024.	COCHRANE_0000304-306		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0844	Email USIBWC Operations and Maintenance Division Watercraft and Equipment Assets. Date: 02/13/2024.	US0002302-302	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0845	Email USIBWC Survey Division Watercraft and Equipment Assets on the Rio Grande. Date: 02/13/2024.	US0002303-304	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0846	Email USIBWC Water Accounting Division Watercraft and Equipment Assets on the Rio Grande. Date: 02/13/2024.	US0002305-306	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is hearsay and not subject to an exception and is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0847	Expert Rebuttal Report Regarding the Historical Uses of the Lower Rio Grande River, Particularly in the Eagle Pass- Piedras Negras Area. Date: 07/12/2024.	US0002513-532		*	Hearsay, bolstering, unfair prejudice, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is not a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document contains no facts relevant to the issues before the Court, and document is intended to bolster the W's testimony
P-0848	Matt Walter, "Love on the Rio Grande: The 1850 Exploration by Captain Love." Journal of Big Bend Studies 19. Date: 2007.	US0002533-533	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0849	The Southwestern Historical Quarterly. Date: Oct. 1924.	US0002534-558	*		Hearsay, relevance or, alternatively, undue delay, waste of time,	This document is irrelevant to the claims at issue, and is needlessly cumulative of

					needless presentation of cumulative evidence	other evidence
P-0850	Historia Mexicana. Date: Jan. 1972.	US0002559-603	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0851	The Rio Grande and Texas Land Co.	US0002604-612	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0852	La revolucio de la lectura durante el siglo XIX en Mexico.	US0002613-632	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0853	Republican Crisis and Civil War in North America. 1848-1867.	US0002633-055	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0855	Michael D. Chapman Resume.	US0003102-104		*	none	
P-0856	Missouri River Navigation Project. Date: Jan. 1994.	US0003105-135		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0857	Memo, Missouri River Bank Stabilization Project. Date: 04/05/1988.	US0003136-149		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0858	Soundings 100 years of the Missouri River Navigation Project.	US0003150-338		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0859	Texas - State Agencies.xlsx	USACE0006656-656		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0860	Joint Public Notice. Date: 05/11/2017.	USACE0009252-265		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0861	Water Resource Policies and Authorities Definition of Navigable Waters of the United States. Date: 09/11/1972.	USACE0009460-468		*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0862	Marine Resources Commission permit. Date: 04/17/2017.	USACE0011415-422		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0863	Photograph.	USACE0011458-458		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0864	Photograph.	USACE0011459-459		*	Authentication, relevance or, alternatively, undue delay, waste of time,	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of

					needless presentation of cumulative evidence	other evidence
P-0865	Photograph.	USACE0011460-460		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0866	VMRC. Date: 03/23/2015.	USACE0011461-472		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0867	Letter in regard to Department of the Army permit application. Date: 09/03/2014.	USACE0011480-487		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0868	Navsta Norfolk - Waterfront Barrier.	USACE0011502-505		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0869	NAVSTA Waterfront.	USACE0011506-509		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0870	Letter in reference to the Department of the Army application. Date: 05/03/2023.	USACE0011669-670		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0871	Department of the Army Memorandum Documenting General Permit Verification. Date: 05/03/2023.	USACE0011671-681		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0872	Email River Port Security Barrier. Date: 01/20/2023.	USACE0011682-692		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0873	Email JPA Submission for Installation of a Temporary Floating Security Barrier for Testing/Evaluation at Naval Station Norfolk. Date: 03/24/2015.	USACE0011703-717		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0874	Regional Permit. Date: 08/14/2018.	USACE0011751-763		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0875	Operation Lock and Key 2.0. Date: 05/18/2022.	USCG0000016-025		*	None	
P-0876	Memo Navigability Determination. Date: 10/19/1984.	USCG0000028-035		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0877	LANTAREA Briefing Slide. Date: 03/27/2024.	USCG0000160-160		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0878	Photograph.	USCG0000169-169		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0879	Photograph.	USCG0000170-170		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0880	Operation Falcon Watch. Date: 06/26/2023.	USCG0000171-172		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0881	U.S. Coast Guard Mishap Report. Date: 06/20/2023.	USCG0000173-174		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0882	Memo Predeployment Site Survey (PDSS): Eagle Pass, TX. Date: 01/11/2024.	USCG0000175-176		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0883	Communication Log. Date: 07/26/2017.	USCG0000177-177		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0884	Search and Rescue. Initial Search and Rescue. Date: 07/25/2017.	USCG0000178-183		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0885	Search and Rescue. General Search and Rescue. Date: 05/04/2015.	USCG0000184-190		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0886	Case Report. SAR Disabled Vessel. Date: 05/03/2015.	USCG0000191-195		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0887	Case Report. SAR - P/C T.O.W. - Falcon Lake. Date: 07/26/2017.	USCG0000196-199		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0888	LANTAREA Briefing Slide. Date: 05/23/2023.	USCG0000200-201		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0889	LANTAREA Briefing Slide. Date: 06/01/2023.	USCG0000202-203		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0890	LANTAREA Briefing Slide. Date: 06/08/2023.	USCG0000204-206		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0891	OP Lock & Key. Date: 05/12/2023.	USCG0000207-208		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0892	LANTAREA Briefing Slide. Date: 05/12/2023.	USCG0000209-210		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0893	DEPORD 20-072L. Date: 02/10/2020.	USCG0000211-211		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0894	Sector Corpus Christi Enforcement Falcon Lake OPSUM. Date: 04/16/2023.	USCG0000212-213		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0895	Operations Order to USCG forces for Operation Falcon Watch. Date: 04/16/2023.	USCG0000214-219		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0896	LANTAREA Briefing Slide. Date: 06/29/2023.	USCG0000220-222		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0897	LANTAREA Briefing Slide. Date: 06/21/2023.	USCG0000223-225		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0898	LANTAREA Briefing Slide. Date: 05/18/2023.	USCG0000226-226		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0899	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000227-227		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0900	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000228-228		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation

P-0901	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000229-229		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0902	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000230-231		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0903	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000232-232		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0904	Title 46 - Shipping.	USCG0000233-234		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0905	Subchapter C - Uninspected Vessels.	USCG0000235-308		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion,	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for

					confusing, undue delay, waste of time, needless presentation of cumulative evidence	navigable waters, not an agency regulation
P-0906	U.S. Coast Guard Mishap Report. Date: 07/26/2022.	USCG0000309-310		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0907	Waterways Management (WWM): Hazards to Navigation Tactics, Techniques, and Procedures (TTP). Date: Feb. 2016.	USCG0000311-348		*	Relevance and, alternatively, confusing, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation or policies.
P-0908	Title 33 - Navigation and Navigable Waters. Date: 07/10/2024.	USCG0000349-351		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0909	Title 33 - Navigation and Navigable Waters. Date: 07/08/2024.	USCG0000352-352		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation

P-0910	Memorandum of Agreement Between the United States Army Corps of Engineers and the United States Coast Guard. Date: 06/02/2000.	USCG0000611-613		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0911	Memorandum of Understanding Between United States Army Corps of Engineers and United States Coast Guard Regarding the Mitigation of Obstructions to Navigation. Date: 10/05/2012.	USCG0000614-620		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0912	United States Coast Guard Maritime Commerce Strategic Outlook. Date: Oct. 2018.	USCG0000621-660		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0913	Certification of Inspection. Date: 06/27/2023.	USCG0000688-689		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0914	Certification of Inspection. Date: 10/28/2021.	USCG0000690-691		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0915	U.S. Coast Guard Maritime Law Enforcement Manual (MLEM). Date: 11/20/2020.	USCG0000692-718		*	Authentication, relevance or, alternatively, undue delay, waste of time, needless presentation of	This document lacks authentication, is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

					cumulative evidence	
P-0916	Chapter 5 - Non Coast Guard Maintained Aids.	USCG0000719-735		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0917	Aids to Navigation Manual Administration. Date: 03/02/2005.	USCG0000736-748		*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulation
P-0918	Jesse Sumpter, REMINISCENCES.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream
P-0919	Inland Waterway Navigation Value to the Nation (Zhao Report Ex. 3).			*	None	
P-0920	USACE Inland Navigation Economics Cost Benefit Analysis 101 (Zhao Report Ex. 28). Date: 12/02/2015.			*	None	
P-0921	Cora Montgomery [Jane Cazneau], Eagle Pass; or Life on the Border. Date: 09/29/1852.		*		Relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Document depicts bank-to-bank ferry activity, not commercial navigation upstream/downstream

P-0922	Defendants' Response to U.S. Requests for Admission. Date: 03/11/2024.			*	Relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue in this case
P-0923	Expert Report of Tong Zhao. Date: 06/14/2024.			*	None	
P-0924	Response to letter regarding activities carried out by the State of Texas. Date: 08/14/2023.	DOS_0199680-681		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0925	The withdrawal of the connected buoys and structures, installed by authorities of the State of Texas. Date: 08/17/2023.	DOS_0199822-822	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0926	Letter Field visit performed by this Mexican Section. Date: 06/09/2023.	DOS0191799-801	*		Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0927	Email DPS//Cochrane Weekly Check In. 6.16.2023. Date: 06/16/2023.	STATE_007899-900		*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0929	The Fur Trade Review. Date: 03/01/1898.		*		Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, and relates to a single trip by a fur trader which does not show sustained commercial navigation

P-0930	Frederick Law Olmstead, A Journey Through Texas. Date: 1857.		*		None	
P-0931	Border Report, "'We aren't asking for permission': Gov. Abbott defends use of concertina wire along El Paso border" (April 12, 2023). Date: 04/12/2023.			*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0932	1870 U.S. Census, Eagle Pass, Texas (excerpt). Date: 07/16/1870.		*		Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0933	1915 Annual Report of the Chief of Engineers, Appendix: A Historical Summary Giving the Scope of Previous Projects for the Improvement of Certain Rivers and Harbors (excerpt). Date: 1915.		*		Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0934	1860 U.S. Census, Eagle Pass, Texas (excerpt). Date: 07/26/1860.			*	Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0935	1880 U.S. Census, Maverick County, Texas (excerpt). Date: 06/05/1880.			*	Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence

P-0936	Chapman Report Appendix A.	US0003097-097		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief, needlessly cumulative of testimony
P-0937	Chapman Report Appendix B.	US0003098-098		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief, needlessly cumulative of testimony

P-0938	Rebuttal Expert Report of Michael D. Chapman.	US0003056-101		*	Hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief, document is needlessly cumulative of live testimony
P-0939	Chapman Report Appendix D.	US0003100-100		*	Authentication, hearsay, unfair prejudice, confusing, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief
P-0940	Chapman Report Figure 1.	US0003064-064	*		Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively,	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-

					undue delay, waste of time, needless presentation of cumulative evidence	examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0941	Chapman Report Figure 2.	US0003065-065	*		Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0942	Chapman Report Figure 3.	US0003066-066		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not

						relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0943	Chapman Report Figure 4.	US0003067-067	*		Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0944	Chapman Report Figure 5.	US0003067-067		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the

						W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0945	Chapman Report Figure 6.	US0003068-068	*		Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0946	Chapman Report Figure 7.	US0003071-071		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.

P-0947	Chapman Report Figure 8.	US0003077-077		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0948	Chapman Report Figure 9.	US0003078-078		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0949	Chapman Report Figure 10.	US0003079-079		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively,	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-

					undue delay, waste of time, needless presentation of cumulative evidence	examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0950	Chapman Report Figure 11.	US0003080-080		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0951	Chapman Report Figure 12.	US0003081-081		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not

						relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0952	Chapman Report Figure 13.	US0003081-081		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0953	Chapman Report Figure 14.	US0003082-082		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the

						W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0954	Chapman Report Figure 15.	US0003082-082		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0955	Chapman Report Figure 16.	US0003083-083		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.

P-0956	Chapman Report Figure 17.	US0003083-083		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0957	Chapman Report Figure 18.	US0003084-084		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0958	Chapman Report Figure 19.	US0003085-085		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively,	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-

					undue delay, waste of time, needless presentation of cumulative evidence	examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0959	Chapman Report Figure 20.	US0003085-085		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0960	Chapman Report Figure 21.	US0003086-086		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not

						relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0961	Chapman Report Figure 22.	US0003086-086		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0962	Chapman Report Figure 23.	US0003087-087		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the

						W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0963	Chapman Report Figure 24.	US0003088-088		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0964	Chapman Report Figure 25.	US0003088-088		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.

P-0965	Chapman Report Figure 26.	US0003089-089		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0966	Chapman Report Figure 27.	US0003089-089		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0967	Chapman Report Figure 28.	US0003090-090		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively,	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-

					undue delay, waste of time, needless presentation of cumulative evidence	examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0968	Chapman Report Figure 29.	US0003091-091		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0969	Chapman Report Figure 30.	US0003092-092		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not

						relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0970	Chapman Report Figure 31.	US0003093-093		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0971	Chapman Report Table 1.	US0003095-095		*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the

						W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0972	Title 33 - Navigation and Navigable Waters.			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulations or policies
P-0973	Chapter 1 - Coast Guard, Dept. of Transportation.			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulations or policies
P-0974	Title 33 - Navigation and Navigable Waters.			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulations or policies
P-0975	Chapter 1 - Coast Guard, Dept. of Transportation.			*	Relevance and, alternatively, unfairly prejudicial, offered as a legal conclusion, confusing, undue delay, waste of time, needless presentation of cumulative evidence	The Fifth Circuit's en banc majority ruling is the law of the case governing the definition and test for navigable waters, not an agency regulations or policies

P-0976	Texas Experts' Omnibus Draft Report Outline (redacted).	STATE_017061-077		*	Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, it is highly prejudicial because it is intended to imply that the W were coached
P-0977	Cover email to Texas Experts' Omnibus Draft Report Outline (redacted). Date: 06/04/2024.	STATE_017060-060		*	Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, it is highly prejudicial because it is intended to imply that the W were coached
P-0978	Oral and Videotaped Deposition of Expert Witness Michael Chapman. Date: 07/19/2024.			*	Hearsay, bolstering, , and needless presentation of cumulative evidence	Document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and is cumulative of the testimony Johnson will present at trial
P-0979	Chapman Dep. Ex. 1.			*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0980	Chapman Dep. Ex. 2.			*	Hearsay, relevance or, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence
P-0981	Chapman Dep. Ex. 3.			*	Hearsay, unfair prejudice, bolstering, undue delay, waste of	Individual is a testifying W, document is hearsay and not subject to an exception,

					time, needless presentation of cumulative evidence	document is intended to bolster W testimony, Defendants cannot cross-examine testimony in document, and document contains no facts relevant to the issues before the Court
P-0982	Chapman Dep. Ex. 4.			*	None	
P-0983	Chapman Dep. Ex. 5.			*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0984	Chapman Dep. Ex. 6.			*	none	
P-0985	Chapman Dep. Ex. 7.			*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document

					cumulative evidence	contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0986	Chapman Dep. Ex. 8.			*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0987	Chapman Dep. Ex. 9.			*	Authentication, hearsay, unfair prejudice, bolstering, relevance and, alternatively, undue delay, waste of time, needless presentation of cumulative evidence	Individual is a testifying W, document is hearsay and not subject to an exception, Defendants cannot cross-examine testimony in document, document lacks authentication, document contains facts that are not relevant to the issues before the Court, and the document is intended to

						bolster the testimony of the W, and the W is a rebuttal W while the evidence relied upon is for the USA's case-in-chief.
P-0988	Oral and Videotaped Deposition of Francisco Saenz. Date: 07/11/2024.			*	Hearsay, bolstering, , and needless presentation of cumulative evidence	Document is hearsay and does not comply with FRCP 32, Defendants cannot cross-examine testimony in document, not designated in violation of the scheduling order, and is cumulative of the testimony Johnson will present at trial
P-0989	William H. Emory, Report on the United States and Mexican Boundary Survey (1857). Date: 1857.			*	Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, and does not show sustained upstream/downstream commercial navigation of the Rio Grande River
P-0990	Frank Leslie's Illustrated Newspaper (Sept. 3, 1864). Date: 09/03/1864.			*	Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, and does not show sustained upstream/downstream commercial navigation of the Rio Grande River
P-0991	Handwritten Letter to Asst. Quartermaster's Office. Date: 03/15/1849.		*		Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, and does not show sustained upstream/downstream

						commercial navigation of the Rio Grande River
P-0992	Handwritten Letter to Asst. Quartermaster's Office. Date: 03/15/1849.		*		Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, and does not show sustained upstream/downstream commercial navigation of the Rio Grande River
P-0993	Travelers and the Fireside. The Eagle Pass; or Life on the Border. Date: 09/29/1852.		*		Relevance or, alternatively, confusing, undue delay, waste of time, needless presentation of cumulative evidence	This document is irrelevant to the claims at issue, and is needlessly cumulative of other evidence, and does not show sustained upstream/downstream commercial navigation of the Rio Grande River

Defendants reserve the right to raise additional objections to Plaintiff's exhibits not included in the foregoing, to withdraw objections they currently have raised, and to amend or modify their objections in response to any changes that Plaintiff may make to the exhibit list it filed on October 28, 2024.

III. OBJECTIONS AND COUNTER-DESIGNATIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS

In response to the designations of witness depositions that Plaintiff included in its pre-trial submissions on October 28, 2024, Defendants make the following counter-designations.

Thomas P. Ciarametaro

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Ivan Morua

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Ancil Taylor

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Defendants reserve the right to designate additional portions of the foregoing deposition testimony and reserve their rights to object to Plaintiff's use of deposition testimony at trial.

Dated October 31, 2024

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Attorney General of the State of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
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Respectfully submitted,

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

On October 31, 2024, this document was filed electronically through the Court's CM/ECF system, which automatically serves all counsel of record.

/s/ David Bryant
DAVID BRYANT
Senior Special Counsel